EVALUATION - VIOLATION - ENFORCEMENT FORM I

C-4

HANDLER | Date Submitted

ID Number: W V D 0 0 0 7 9 7 7 2 0 | LDF[ ] TSF[ ] INC[ ] LQG[X] SQG[ ] TRA[ ]

Handler Name: Wheeling-Pittsburgh Steel - Beech Bottom Plant

CEI 7/8/93

Street: 1134 Market Street

City: Wheeling, WV 26003

EVALUATION Add [X] Change [ ] Delete [ ]

Date ■	Number ¤	Agency ■	Type ■	Reason	Branch	Person
01 07 92		S	CEI		CM	JAG

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

GER		GOR	EV	TGR	NA	DCH	NA	DGW	NA	DMC	NA	DPP	NA	CAS	
GEX		GPT	EV	TMR	NA	DCL	NA	DIN	NA	DMR	NA	DSI	NA	FEA	
GGR	EV	GRR	EV	TOR	NA	DCP	NA	DLB	NA	DOR	NA	DTR	NA		
GLB	EV	GSC	EV	TRR	NA	DFR	NA	DLF	NA	DOT	NA	DTT	NA		
GMR	EV	GSQ	EV	TWD	NA	DGS	NA	DLT	NA	DPB	NA	DWP	NA		

Comments:

VIOLATION Add [X] Change [ ] Delete [ ]

Agency ■	Number ¤	Area ■	Class ■	Regulation Type	Regulation Citation
S	4	GPT	I	SR	40CFR 265.35 ↔ 47CSR 35-6.3.5.a.5

Date Determined ▲	Priority	Branch	Person	Returned to Compliance Scheduled ▲	Returned to Compliance Actual ▲
	4	CM	JAG		[redacted]

Comments: AISLE SPACING

VIOLATION Add [X] Change [ ] Delete [ ]

Agency ■	Number ¤	Area ■	Class ■	Regulation Type	Regulation Citation
S	5	GPT	I	SR	47CSR 35-6.3.5.b

Date Determined ▲	Priority	Branch	Person	Returned to Compliance Scheduled ▲	Returned to Compliance Actual ▲
	6	CM	JAG		[redacted]

Comments: OVER 90 DAY STORAGE

VIOLATION Add [X] Change [ ] Delete [ ]

Agency ■	Number ¤	Area ■	Class ■	Regulation Type	Regulation Citation
S	6	GPT	I	SR	47CSR 35-6.3.5.a.3 & 4.

Date Determined ▲	Priority	Branch	Person	Returned to Compliance Scheduled ▲	Returned to Compliance Actual ▲
	8	CM	JAG		[redacted]

Comments: No LABEL

VIOLATION Add [X] Change [ ] Delete [ ]

Agency ■	Number ¤	Area ■	Class ■	Regulation Type	Regulation Citation
S	1	GLB	I	SR	40CFR 268.7(a)(6) ← 47CSR 35-7

Date Determined ▲	Priority	Branch	Person	Returned to Compliance Scheduled ▲	Returned to Compliance Actual ▲
	8	CM	JAG		[redacted]

Comments: No LBR Form

[ ] Required ■ [ ] Required if pertinent ▲ [ ] Required only for previously reported data ¤ Not Required by EPA

EVALUATION - VIOLATION - ENFORCEMENT FORM

ID Number	Handler Name
WVD007972720	Wheeling Pittsburgh Steel- Beech Bottom Plant

VIOLATION — Add [X] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S	1	GPT	I	S.R	40CFR265.16 ← 47CSR 35-6.3.5a.5

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
	9	CM	JAG		[redacted]

Comments: No Employee Training Records

VIOLATION — Add [X] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S	4	GPT	I	S.R	40CFR265.52(e) ← 47CSR 35-6.3.5a.-

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
	8	CM	JAG		[redacted] ?

Comments: Contingency Plan Not Complete

VIOLATION — Add [ ] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual

Comments:

ENFORCEMENT — Add [ ] Change [ ] Delete [ ]

Date	Number	Agency	Type	Branch	Person

Penalty Assessed: Settled:

COVERED VIOLATIONS

Agency	Number	Area	Agency	Number	Area	Agency	Number	Area

PENALTY PAYMENTS

Date	Amount	Date	Amount

Comments:

4/91

EVALUATION - VIOLATION - ENFORCEMENT FORM I

HANDLER | Date Submitted

ID Number: WVD007972720 | LDF[ ] TSF[ ] INC[ ] LQG[X] SQG[ ] TRA[ ]

Handler Name: *Wheeling-Pittsburgh Steel - Beech Bottom Plant*

Street: *1134 Market Street* | City: *Wheeling, WV 26003*

EVALUATION Add [X] Change [ ] Delete [ ]

Date	Number	Agency	Type	Reason	Branch	Person
01/07/92		S	CEI		CM	JAG

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

GER		GOR	EV	TGR	NA	DCH	NA	DGW	NA	DMC	NA	DPP	NA	CAS	
GEX		GPT	EV	TMR	NA	DCL	NA	DIN	NA	DMR	NA	DSI	NA	FEA	
GGR	EV	GRR	EV	TOR	NA	DCP	NA	DLB	NA	DOR	NA	DTR	NA		
GLB	EV	GSC	EV	TRR	NA	DFR	NA	DLF	NA	DOT	NA	DTT	NA		
GMR	EV	GSQ	EV	TWD	NA	DGS	NA	DLT	NA	DPB	NA	DWP	NA		

Comments:

VIOLATION Add [X] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		GPT	I	SR	40CFR 265.35 ↔ 47CSR 35-6.3.5.a.5

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
	4	CM	JAG		

Comments: AISLE SPACING

VIOLATION Add [X] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		GPT	I	SR	47CSR 35-6.3.5.b

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
	6	CM	JAG		

Comments: OVER 90 DAY STORAGE

VIOLATION Add [X] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		GPT	I	SR	47CSR 35-6.3.5a.3. & 4.

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
	8	CM	JAG		

Comments: No LABEL

VIOLATION Add [X] Change [ ] Delete [ ]

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		GLB	I	SR	40CFR 268.7(a)(6) ← 47CSR 35-7

Date Determined	Priority	Branch	Person	Returned to Compliance Scheduled	Returned to Compliance Actual
	8	CM	JAG		

Comments: No LBR Form

4/91

EVALUATION - VIOLATION - ENFORCEMENT FORM II

ID Number	Handler Name
WVD007977209	Wheeling Pittsburgh Steel- Beech Bottom Plant

VIOLATION — Add [X] Change [ ] Delete [ ]

Agency ■: S | Number ¤: | Area ■: GPT | Class ■: I | Regulation Type: S.R | Regulation Citation: 40CFR265.16 ← 47CSR35-6.3.5a.5

Date Determined ▲: | Priority: 9 | Branch: CM | Person: JAG | Returned to Compliance Scheduled ▲: | Actual ▲:

Comments: No Employee Training Records

VIOLATION — Add [X] Change [ ] Delete [ ]

Agency ■: S | Number ¤: | Area ■: GPT | Class ■: I | Regulation Type: S.R | Regulation Citation: 40CFR265.52(e) ← 47CSR35-6.3.5a.5

Date Determined ▲: | Priority: 8 | Branch: CM | Person: JAG | Returned to Compliance Scheduled ▲: | Actual ▲:

Comments: Contingency Plan Not Complete

VIOLATION — Add [ ] Change [ ] Delete [ ]

Agency ■: | Number ¤: | Area ■: | Class ■: | Regulation Type: | Regulation Citation:

Date Determined ▲: | Priority: | Branch: | Person: | Returned to Compliance Scheduled ▲: | Actual ▲:

Comments:

ENFORCEMENT — Add [ ] Change [ ] Delete [ ]

Date ■: | Number ¤: | Agency ■: | Type ■: | Branch: | Person:

Penalty Assessed ▲: | Settled ▲:

COVERED VIOLATIONS

Agency ▲	Number ▲	Area ▲	Agency ▲	Number ▲	Area ▲	Agency ▲	Number ▲	Area ▲

PENALTY PAYMENTS

Date	Amount	Date	Amount

Comments:

STATE OF WEST VIRGINIA
DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES
WASTE MANAGEMENT SECTION
1356 Hansford Street
Charleston, West Virginia 25301
Telephone (304)348-5929

GASTON CAPERTON
Governor

March 2, 1992

J. EDWARD HAMRICK III
Director

ANN A. SPANER
Deputy Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jeffrey McKinney
Wheeling-Pittsburgh Steel Corporation
1134 Market Street
Wheeling, West Virginia 26003

Dear Mr. McKinney:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by representatives of the Chief of the Waste Management Section. This report is based on the inspection conducted on January 7, 1992.

Please refer to the **Violations/Notice of Violation** sections of the report for those violations discovered during the course of this inspection.

A copy of this report has been referred to the Administrative Enforcement Unit of this Section for further action, and also, a copy is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact this office at **(304) 348-5989.**

Sincerely,

H. Michael Dorsey
Assistant Chief
Compliance Monitoring/Enforcement

HMD/kw

Enclosures

cc: Naomi Henry, U.S. EPA Region III
Civil and Administrative Enforcement Unit
Jim Gaston, Inspector
File

INSPECTION FACT SHEET

COMPANY NAME: Wheeling Pittsburgh Steel Corp I.D.: WVD000797720

MAILING ADDRESS: 1134 Market Street
Wheeling, WV 26003

TYPE OF FACILITY: Generator

LOCATION: WV Rt. 2
Beech Bottom, WV.505

COUNTY: Brooke (009)

COMPANY CONTACT: Mr. Jeffrey McKinney

CODES: SO1

PHONE: (304) 234-2685

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR Part 265.

LIST OF CHEMICALS:
(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

__X__ VIOLATIONS

DATE INSPECTED: 7 January 1992

_____ NO VIOLATIONS

INSPECTOR(S): (1) James A. Gaston, West Virginia Department of Natural Resources, Division of Waste Management, Wheeling Field Office.
(2) Pamela S. Beltz, WV DNR-WMS, Wheeling Field Office.

DATE PREPARED: 15 January 1992

PREPARED BY: James A. Gaston, Division of Waste Management

COMPLIANCE EVALUATION INSPECTION

RE: Wheeling Pittsburgh Steel
Beech Bottom Plant

DATE INSPECTED: 7 January 1992

INSPECTORS: James A. Gaston, WV DNR-WMS
Pamela S. Beltz, WV DNR-WMS

DATE PREPARED: 15 January 1992

PREPARED BY: James A. Gaston

On January 7, 1992 at approximately 10:15 hours the above referenced inspectors conducted a Compliance Evaluation Inspection of Wheeling Pittsburgh Steel Corporation's Beech Bottom Plant.

Upon our arrival we were met by Mr. Jim Howell, Superintendent of Maintenance and Services, who had not previously been advised of our intention to inspect the facility. Later in the inspection we were joined by Mr. Jeffrey McKinney, Environmental Coordinator.

Upon presentation of the appropriate credentials, the company officials were informed of our authority as representatives of the Chief of the Waste Management Section pursuant to Chapter 20 of the Code of West Virginia and as specified by Section 3007 (a) of the Resource Conservation and Recovery Act; and they acknowledged our authority. The company officials were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E), and the regulations promulgated thereunder.

The machinery used for producing expanded metal grating has been sold to a firm in Mexico. This portion of the plant is now inactive.

This inspection started with a visit to the hazardous waste storage area which is contained in a building at the south end of the facility. This building contained many drums, most of which contained used oil. Oil spillage was noted on the southeast corner of the building (see Photo #4). An oil boom had been placed in the corner but no cleanup had taken place. No attempt to identify or isolate the source of the spilled material had been made. A composite sample of the used oil is made before shipping off-site.

The drums containing hazardous waste were in three non-uniform rows (see Photo #5). These rows exhibited insufficient aisle spacing which hindered inspection of the drums. One drum containing asbestos, one drum of scrap galvanized flakes, one drum containing floor-dry and oil, and four drums containing waste grinder oil were mixed in with the drums containing hazardous waste. A tracking system which includes the use of painting identification numbers is used at the Beech Bottom Plant. Two drums had been identified as #79. The tracking document stated that drum #79 contained rags. In actuality, one drum marked #79 contained roll grindings and the other drum

marked #79 appeared to be floor-dry used in oil spill cleanup. One of the drums marked #79 was dated 9-10-91; this drum contained rubber roll grindings. Analysis of roll grindings similar to those contained in drum #79 exhibited high levels of lead (see Att. "C"). Drum #79 had exceeded the 90-day storage limit. This drum also did not exhibit a hazardous waste label (see Photo #3). The second drum marked #79 exhibited a hazardous waste label identifying the material as D005/D007/D008/D035 (rags with paint waste), but actually contained floor-dry from an oil clean-up (see Photos #1 & #2).

A visit to the paint lines revealed no violations during this inspection.

A review of manifests revealed that manifest document #KC001 (see Att. "D") did not have a Land Ban form attached to it. This shipment contained material identified as D001/D018. During the initial inspection of manifests, no Land Ban form was found for manifest document #BI010. This form was later found in the guardhouse.

The annual report was not found on-site. Mr. McKinney stated that this report is maintained at the Wheeling Corporate Office. A review of training records revealed that no training has been documented since 1989. A review of the contingency plan revealed that the required list and location map of emergency and spill equipment were not present.

Mr. McKinney informed us that a review of past samples of the waste water treatment sludge has prompted the Beech Bottom Plant to handle this sludge as a nonhazardous solid waste (see Att. "E").

On January 10, 1992 this inspector visited Mr. McKinney at Wheeling Pittsburgh Steel's Corporate Office. Mr. McKinney explained that the one drum that had exceeded the 90-day storage limit was to have been picked up on a "milk run" that included the Martins Ferry Plant. When the Martins Ferry Plant canceled their pickup the hauler was not told to continue the route. The paper work review was then continued from the plant inspection. This inspector received a copy of the 1990 annual reports for all three of Wheeling Pitt's plants in West Virginia. Note: The Hazardous Waste Emergency Response Fund Fee Assessment Report was not signed (see Att. "F-5"). EPA ID# on annual report is wrong.

Mr. McKinney supplied a copy of the waste analysis conducted on both the rubber roll grindings and the waste water treatment sludge. No analysis was found for the scrap galvanize flakes. No analysis were on file for the composite waste oil samples that are taken, but Mr. McKinney stated that he would get copies of the analysis from the oil handling company and send them to the Wheeling Field Office.

No employee training records were found for 1990 or 1991. Mr. McKinney produced a document that discussed the potential material to be covered in an upcoming employee training session scheduled to be held on June 10, 1991; however no evidence exists to show that the training had actually occurred.

AREAS OF CONCERN

A clean-up of the oil spill in the southeast end of the drum storage building needs to be immediately initiated. The source of the spillage needs to be identified and the leak stopped.

Old "Hazardous Waste" labels must be removed from drums that are reused for nonhazardous waste.

Drums of nonhazardous waste should be segregated from the hazardous waste section to prevent confusion.

VIOLATIONS

1) The hazardous waste storage area exhibited inadequate aisle space to allow unobstructed movement of personnel and equipment as required by 40 CFR 265.35 as referenced by 47 CSR 35-6.3.5.a.5.

2) Hazardous waste was stored on site over the 90-day limit without requesting an extension and without a permit in violation of 47 CSR 35-6.3.5.b.

3) A drum containing hazardous waste (D008) did not exhibit a hazardous waste label in violation of 47 CSR 35-6.3.5.a.3 and 4.

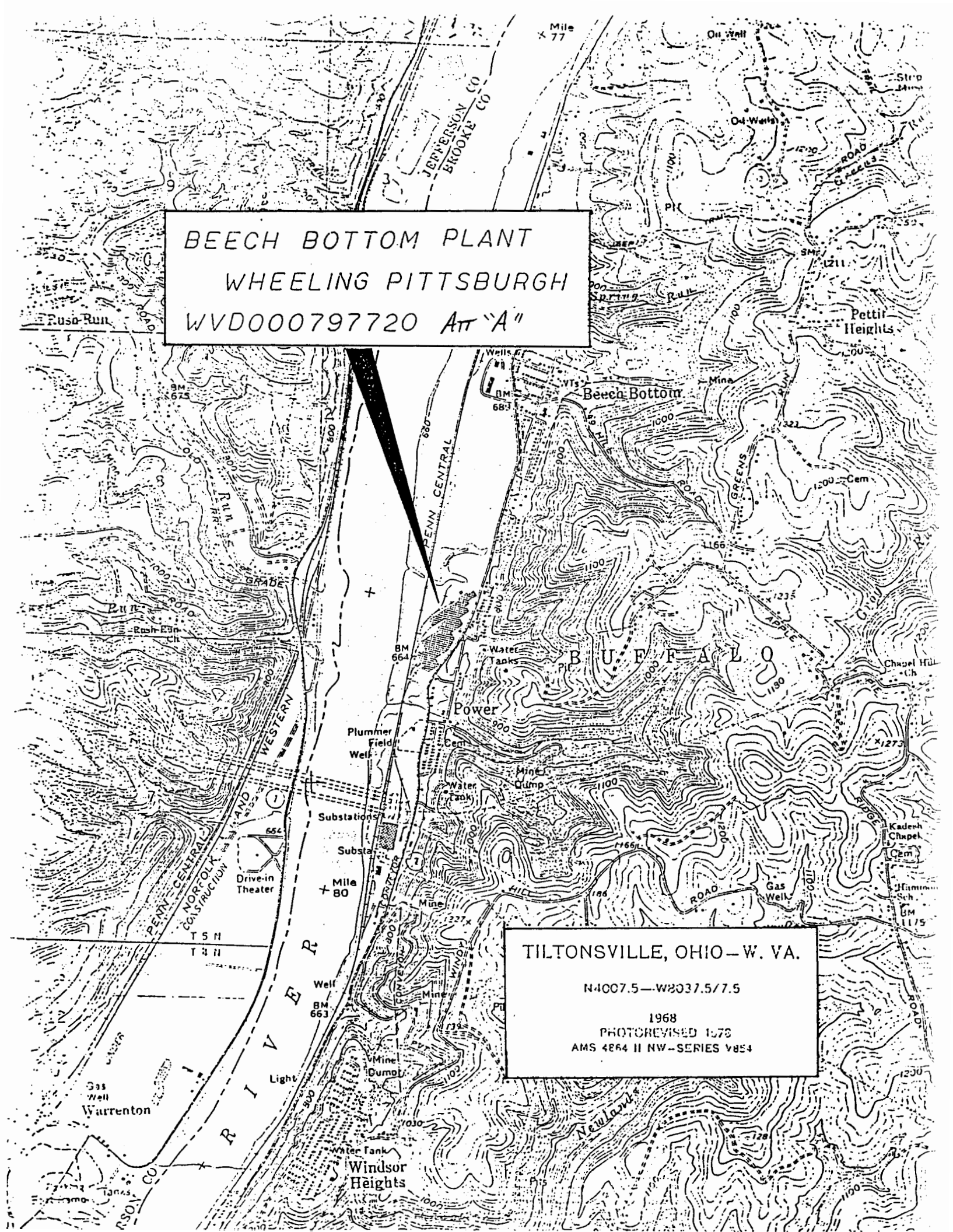
4) The Beach Bottom Plant did not maintain a record of the Land Ban form in violation of 40 CFR 268.7 (a) (6) as referenced by 47 CSR 35-7.

5) No evidence or records of employee training were offered for 1990 or 1991 in violation of 40 CFR 265.16 as referenced by 47 CSR 35-6.3.5.a.5.

6) The contingency plan did not have a list of emergency equipment and their location in violation of 40 CFR 265.52 (e) as referenced by 47 CSR 35-6.3.5.a.5.

CONCLUSION

These violations will be forwarded to the Enforcement Office for further review/action.


BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720 Att "A"
TILTONSVILLE, OHIO—W. VA.
N4007.5—W8037.5/7.5
1968
PHOTOREVISED 1978
AMS 4864 II NW—SERIES V854
Beech Bottom
Power
Plummer Field
Substation
Substa
Water Tanks
Water Tank
Drive-in Theater
Mile 80
Mile 77
Gas Well
Warrenton
Windsor Heights
Newlandsville
Pettit Heights
Kadesh Chapel
Chapel Hill Ch
Rush Run
Rush Run Ch
Oil Well
Oil Wells
Mine
Mine Dump
Cem
Well
Light
Tanks
PENN CENTRAL
NORFOLK AND WESTERN
JEFFERSON CO
BROOKE CO
RIVER
ROAD
HILL
RIDGE
RUN
BUFFALO

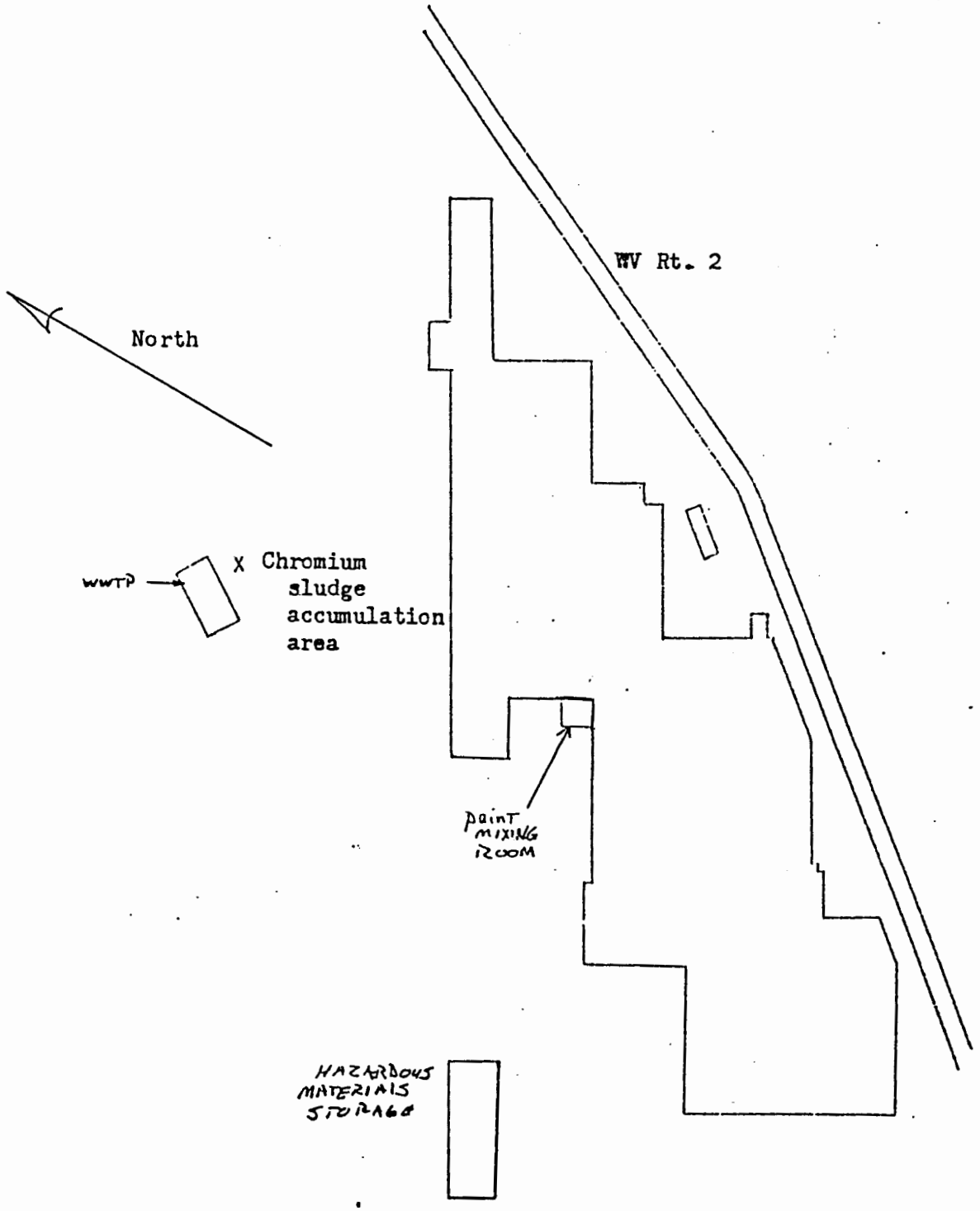
ATTACHMENT "B"

SITE MAP

BEECH BOTTOM PLANT

WHEELING PITTSBURGH

WVD000797720



* MAP NOT TO SCALE

FOR MR. 3500062
03108

Att "C-1"

Wheeling Pittsburgh
STEEL CORPORATION

RECEIVED
JUN 10 1992
Environmental Control

SC 1802 REV 9-89

INTEROFFICE CORRESPONDENCE

To: J. M. Howell (BB01)

DATE: June 14, 1991

FROM: Martin Stephenson
Environmental Control

Re: Hazardous Waste Issues
Beech Bottom, WV Facility

Attached is are the results of analysis done on a sample of the roll grinding dust generated at the Beech Bottom plant. The results indicate that the dust is a D008 hazardous waste as defined by USEPA for lead.

This waste stream will require treatment and disposal. Please collect three one-quart jars of this material. Each jar will be sent to the organizations listed below to gain approval of the waste stream.

1. American Waste Services, Inc. (Disposal at Michigan Disposal)
2. Autumn, Inc. (Disposal at Chemical Waste Mgmt)
3. Stout Environmental Services (Disposal at Ecolotec, Inc.)

A requisition should be placed ASAP for disposal. Joe Hurley will be the buyer.

Enclosed are five hazardous waste labels. You only have to fill in the date of accumulation and stick the label to the drum.

Please have the jars available by Monday June 17, 1991.

If you have any questions, do not hesitate to call.

Thank you.

cc:
D. Lehman (BB01 w/ analysis)
R. Maziak (BB01 w/ analysis)
J. Allen (BB01 w/ analysis)
S. Beecroft (BB01 w/ analysis)
J. Hurley (W10A w/ analysis)
TJW/WRS/B.B. 1991 Haz. Waste MFILE

Note: All labels were sent to J.M. Howell

LEAD IS FROM LEAD OXIDE USED AS CURING AGENT IN THE HYPALON. PER DAN SULLIVAN, INDUSTRIAL RUBBER, THE HYPALON CAN BE MADE

MPLE ID Grinding Dust FRACTION 01A TEST CODE TC_ME NAME TCLP Metals
Date & Time Collected 05/04/91 Category SOLID

TCLP EXTRACTION DATE: 05/28/91

UNITS: mg/L VERIFIED: CLC

EPA HW#	CAS#	COMPOUND NAME	RESULT	REGULATORY LIMIT
D004	7440-38-2	Arsenic	<0.04	5.0
D005	7440-39-3	Barium	<1	100.0
D006	7440-43-9	Cadmium	<0.1	1.0
D007	7440-47-3	Chromium	0.5	5.0
D008	7439-92-1	Lead	790	5.0
D009	7439-97-6	Mercury	<0.005	0.2
D010	7782-49-2	Selenium	<0.04	1.0
D011	7440-22-4	Silver	<0.4	5.0
		Nickel	0.5	
		Zinc	7.8	

NOTES AND DEFINITIONS FOR THIS REPORT.
NA = NOT ANALYZED

Att "C-2"

ER-WM-51 REV. 11/89

P. O. Box 8550
Harrisburg, PA 17105-8550

ATT "D"

OMB No. 2050-0039
Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: W V D 0 0 0 7 9 7 7 2 0
Manifest Document No.: K C 0 0 1

2. Page 1 of 1

Information in the shaded areas is not required by Federal law but is required by State law.

3. Generator's Name and Mailing Address
WHEELING-PITTSBURGH STEEL CORP.
ROUTE 2, BEECH BOTTOM, WV 26030

A. State Manifest Document Number: PAC 4363741

B. State Gen. ID: WVD 000 797 720

4. Generator's Phone (304) 234-2685 OR (304) 234-7628

5. Transporter 1 Company Name: PETROCLEAN, INC.
6. US EPA ID Number: P A D 0 9 8 4 3 1 8 8 5

C. State Trans. ID: PA- A H 0 1 0 9

7. Transporter 2 Company Name:
8. US EPA ID Number:

D. Transporter's Phone: 412 279-9556

E. State Trans. ID: PA-

9. Designated Facility Name and Site Address
KEYSTONE CEMENT COMPANY
ROUTE 329
BATH, PA 18014
10. US EPA ID Number: P A D 0 0 2 3 8 9 5 5 9

F. Transporter's Phone ( )

G. State Facility's ID

H. Facility's Phone: 215 837-2229

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, WASTE FLAMMABLE LIQUID, N.O.S, (GASOLINE, NAPTHA), FLAMMABLE LIQUID, UN 1993	0 0 1	T T	05200	G	D 0 0 1 / D 0 1 8
b.					
c. This shipment contains hazardous waste which is restricted or prohibited from land disposal under 40 CFR 261.2.					
d.					

J. Additional Descriptions for Materials Listed Above

	Lab Pack	Physical State
a.		
b.		
c.		
d.		

K. Handling Codes for Wastes Listed Above

a. 302	c.
b.	d.

15. Special Handling Instructions and Additional Information

Acceptance approval via Petroclean, Inc.
generic approval. Emergency Response Guide #27.
EMERGENCY CONTACT: Petroclean, Inc. (24 hours)
(412) 279-9556

NOTE: RETURN COPY 5 TO:
WHEELING-PITTSBURGH STEEL CORP.
1134 MARKET ST.
WHEELING, WV 26003
IF UNDELIVERABLE: RETURN TO GENERATOR

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[signature]	11	04	91

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
D MCDONALD	[signature]	11	05	91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

NOT GALS RCVD 5025 SA

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
TIMOTHY S. STOUT	[signature]	11	06	91

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

GENERATOR

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete

Copy 5 - TSD Facility Mail to Generator

Att "E-1"

Wheeling Pittsburgh
STEEL CORPORATION

SC 1802 REV 9-89

INTEROFFICE CORRESPONDENCE

To: J. Allen
J. Howell
D. Strickler

Date: November 26, 1991

From: Jeff McKinney
Environmental Control Dept.

RE: CHARACTERIZATION OF BEECH BOTTOM WASTEWATER TREATMENT SLUDGE IDENTIFIED BY KEMRON ANALYSIS UNDER WORK ORDER # N1-11-136

According to the analytical results, the wastewater treatment sludge from the Beech Bottom facility is no longer defined as a USEPA Hazardous Waste per 40 CFR 261. Disposal may be contracted with a suitable non-hazardous landfill permitted to accept this material.

Jeff

JMM/cr
Analysis attached

cc: T. Bottorf
TW/WRS/MFile

REPORT TO: Wheeling-Pittsburgh Steel
1134 Market St.
Wheeling, WV 26003

ATTEN: Jeff McKinney

CLIENT: WHEPIT_59500 SAMPLES: 1
COMPANY: Wheeling-Pittsburgh Steel
FACILITY: Wheeling, WV
FAX # 304-234-2613

WORK ID: #1 Beech Bottom WWTP Sludge
TAKEN: Client
TRANS: UPS
TYPE:
P.O. #:
INVOICE: under separate cover

PREPARED BY: KEMRON ENVIRONMENTAL SERVICES
109 STARLITE PARK
MARIETTA, OHIO 45750

ATTEN:
PHONE: (614) 373-4071

CERTIFIED BY

CONTACT M_WELCH

ANALYTICAL METHODS AND DOCUMENTATION ARE FOUND AT THE END OF THIS REPORT. ALL RESULTS ON SOILS/SLUDGES ARE REPORTED "AS RECEIVED" UNLESS OTHERWISE SPECIFIED.

SAMPLE IDENTIFICATION

01 #1 Beech Bttm.Sludge

TEST CODES and NAMES used on this workorder

CN_S	Cyanide, Total
CU_S	Copper, Total
FLASH	Ignitability
PB_S	Lead, Total
PCB_S	Polychlorinated Biphenyls
PCT_SC	% Solids - Client Request
PFLT	Paint Filter Liquids Test
PH_LS	pH (Lab) - Solid Matrix
REACTC	Cyanide Reactivity
REACTS	Sulfide Reactivity
TC_EX	TCLP Extraction - Regular
TC_ME	TCLP Metals
TC_SV	TCLP Semivolatiles
TC_VOA	TCLP Volatile Compounds
TC_ZHE	TCLP Zero Headspace Extr.
TPH_S	Petroleum Hydrocarbons
ZN_S	Zinc, Total

PRELIMINARY

KEMRON REPORT
Results by Sample

Work Order # N1-11-136

SAMPLE ID #1 Beech Bttm.Sludge SAMPLE # 01 FRACTIONS: A
Date & Time Collected 11/06/91 10:00:00 Category SLUDGE

CN_S <0.5 mg/kg CN	CU_S 12 mg/kg Cu	FLASH >95 Degrees C	PB_S <10 mg/kg Pb	PCT_SC 25 % wt.	PFLT No Liqui M
PH_LS 8.6 S.U.	REACTC <10 mg/kg HCN	REACTS <100 mg/kg H2S	TPH_S 200 mg/kg	ZN_S 1200 mg/kg Zn	

SAMPLE ID #1 Beech Bttm.Sludge FRACTION 01A TEST CODE PCB_S NAME Polychlorinated Biphenyls
Date & Time Collected 11/05/91 10:00:00 Category SLUDGE

ANALYST: SLN EXTRACTED: 11/12/91 FILE #: 5898
INSTRMT: HP_IV INJECTED: 11/14/91 FACTOR: 660* UNITS: ug/kg VERIFIED: RJW

CAS#	COMPOUND	RESULT	DET LIMIT
12674-11-2	Aroclor-1016	BDL	330
11104-28-2	Aroclor-1221	BDL	330
11141-16-5	Aroclor-1232	BDL	330
53469-21-9	Aroclor-1242	BDL	330
12672-29-6	Aroclor-1248	BDL	330
11097-69-1	Aroclor-1254	BDL	660
11096-82-5	Aroclor-1260	BDL	660

NOTES AND DEFINITIONS FOR THIS REPORT.
DET LIMIT = DETECTION LIMIT
BDL=BELOW DETECTION LIMIT
NA =NOT ANALYZED
* = ELEVATED DETECTION LIMIT DUE TO SAMPLE MATRIX.

SAMPLE ID #1 Beech Bttm.Sludge FRACTION 01A TEST CODE TC ME NAME TCLP Metals
Date & Time Collected 11/06/91 10:00:00 Category SLUDGE

TCLP EXTRACTION DATE: 11/11/91

UNITS: mg/L VERIFIED: CLC

EPA HW#	CAS#	COMPOUND NAME	RESULT	REGULATORY LIMIT
D004	7440-38-2	Arsenic	0.05	5.0
D005	7440-39-3	Barium	<1	100.0
D006	7440-43-9	Cadmium	<0.1	1.0
D007	7440-47-3	Chromium	<0.2	5.0
D008	7439-92-1	Lead	<2	5.0
D009	7439-97-6	Mercury	<0.005	0.2
D010	7782-49-2	Selenium	<0.04	1.0
D011	7440-22-4	Silver	<0.4	5.0
		Nickel	2.2	
		Zinc	0.9	

NOTES AND DEFINITIONS FOR THIS REPORT.
NA = NOT ANALYZED

SAMPLE ID #1 Beech Bttm.Sludge FRACTION 01A TEST CODE TC_SV NAME TCLP Semivolatiles
Date & Time Collected 11/06/91 10:00:00 Category SLUDGE

ANALYST: SDF EXTRACTED: 11/18/91 FILE #: 1WP17307 TCLP EXTRACTION DATE: 11/11/91
INSTRMT: FINN1 INJECTED: 11/23/91 FACTOR: 4 UNITS: ug/L VERIFIED: RJW

EPA HW#	CAS#	COMPOUND NAME	RESULT	DET LIMIT	REGULATORY LIMIT
D023	95-48-7	o-Cresol	BDL	20	200000
D024	108-39-4	m-Cresol*	BDL	20	200000
D025	106-44-5	p-Cresol*	BDL	20	200000
D027	106-46-7	1,4-Dichlorobenzene	BDL	20	7500
D030	121-14-2	2,4-Dinitrotoluene	BDL	20	130
D032	118-74-1	Hexachlorobenzene	BDL	20	130
D033	87-68-3	Hexachlorobutadiene	BDL	20	500
D034	67-72-1	Hexachloroethane	BDL	20	3000
D036	98-95-3	Nitrobenzene	BDL	20	2000
D037	87-86-5	Pentachlorophenol	BDL	100	100000
D038	110-86-1	Pyridine	BDL	100	5000
D041	95-95-4	2,4,5-Trichlorophenol	BDL	20	400000
D042	88-06-2	2,4,6-Trichlorophenol	BDL	20	2000

NOTES AND DEFINITIONS FOR THIS REPORT
DET LIMIT = DETECTION LIMIT
BDL = BELOW DETECTION LIMIT
* = UNRESOLVEABLE COMPOUNDS

SAMPLE ID #1 Beech Bttm.Sludge FRACTION 01A TEST CODE TC_VOA NAME TCLP Volatile Compounds
Date & Time Collected 11/06/91 10:00:00 Category SLUDGE

ANALYST: JPM FILE #: 2WP21359 TCLP EXTRACTION DATE: 11/11/91
INSTRMT: FINN2 INJECTED: 11/20/91 FACTOR: 1 UNITS: ug/L VERIFIED: RJW

EPA HW#	CAS#	COMPOUND NAME	RESULT	DET LIMIT	REGULATORY LIMIT
D018	71-43-2	Benzene	BDL	5.0	500
D019	56-23-5	Carbon tetrachloride	BDL	5.0	500
D021	108-90-7	Chlorobenzene	BDL	5.0	100000
D022	67-66-3	Chloroform	BDL	5.0	6000
D028	107-06-2	1,2-Dichloroethane	BDL	5.0	500
D029	75-35-4	1,1-Dichloroethene	BDL	5.0	700
D035	78-93-3	Methyl ethyl ketone	BDL	100	200000
D039	127-18-4	Tetrachloroethene	BDL	5.0	700
D040	79-01-6	Trichloroethene	BDL	5.0	500
D043	75-01-4	Vinyl chloride	BDL	10	200

NOTES AND DEFINITIONS FOR THIS REPORT
DET LIMIT = DETECTION LIMIT
BDL = BELOW DETECTION LIMIT
* = SEMI-QUANTITATIVE SCREEN ONLY

E-7

Wheeling-Pittsburgh Steel

ANALYTICAL DOCUMENTATION

PARAMETER	ANALYST	ANALYSIS DATE
CN_S	REB	11/18/91
CU_S	PNW	11/25/91
FLASH	DIH	11/13/91
PB_S	PNW	11/25/91
PCT_SC	PDL	11/12/91
PFLT	DIH	11/13/91
PH_LS	DIH	11/13/91
REACTC	REB	11/19/91
REACTS	WMW	11/19/91
TPH_S	ECL	11/20/91
ZN_S	PNW	11/25/91

E-8"

ATT "F-1"

OMB# 2050-0024 Expires 3-31-92

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME Wheeling-Pittsburgh Steel Corp.
Beech Bottom Plant

EPA ID NO. WVD907977720 ← WRONG
WVD000797720

U.S. ENVIRONMENTAL PROTECTION AGENCY

1990
~~1989~~ Hazardous Waste Report

FORM IC

IDENTIFICATION AND CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 7 of the 1989 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box ☒ in items A, B, D, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 7.

A. EPA ID No. Same as label ☐ or WRONG → WVD000797720 WVD061079720

B. Site/company name Same as label ☐ or → Wheeling-Pittsburgh Steel Corp

C. Has the site name associated with this EPA ID changed since 1987? ☐ 1 Yes ☒ 2 No

D. Street name and number. If not applicable, enter industrial park, building name or other physical location description. Same as label ☐ or → Route 2

E. City, town, village, etc. Same as label ☐ or → Beech Bottom

F. County Brooke

G. State Same as label ☐ WV

H. Zip Code Same as label ☐ 26030-

SEC. II Mailing address of site. Instruction page 7.

A. Is the mailing address the same as the location address? ☐ 1 Yes (SKIP TO SEC. III) ☒ 2 No (COMPLETE SEC. II)

B. Number and street name of mailing address: 1134 Market Street

C. City, town, village, etc. Wheeling

D. State WV

E. Zip Code 26003-

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 7.

A. Please print: Last name	First name	M.I.	B. Title	C. Telephone
Stephenson	Martin	J.	Env. Coord. I	304 234-2685 Extension

SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 8.

A.	B.	C.	D.
3479			

SEC. V I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Number of form pages submitted: Form IC 2 Form GM 3 Form WR Form PS

B. Please print: Last name	First name	M.I.	C. Title
Stephenson	Martin	J.	Env. Coord. I

D. Signature: Martin J. Stephenson

E. Date of signature: 03 (MO.) 13 (DAY) 91 (YR.)

ATT "F-2"

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Wheeling-Pittsburgh Steel Corp.
Beech Bottom Plant

EPA ID NO.: W V D 0 0 0 7 0 7 7 2 0

U.S. ENVIRONMENTAL PROTECTION AGENCY

1990 ~~1989~~ Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 15): Waste water treatment sludge.

B. EPA hazardous waste code (Page 15): D 0 0 7

C. State hazardous waste code (Page 16):

D. SIC code (Page 16): 3 4 7 9

E. Source code (Page 16): A 2 1

F. Form code (Page 16): B 5 0 2

G. Origin (Page 16): Code 1; System type M

H. TRI constituent (Page 17): 2

I. CAS numbers (Page 17): 1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in ~~1988~~ 1989 (Instruction Page 17): 3 2 6

B. Quantity generated in ~~1989~~ 1990 (Page 17): 3 5 8

C. UOM (Page 16): 2

D. Density (Page 16): ☐ 1 lbs/gal ☐ 2 sg

E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? (Page 16)
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

SYSTEM 1
System type (Page 16): M
Quantity treated, disposed or recycled in 1989 (Page 16):

SYSTEM 2
System type (Page 16): M
Quantity treated, disposed or recycled in 1989 (Page 16):

Sec. III

A. Was this waste shipped off site? (Instruction Page 19)
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped (Instruction Page 19)	C. System type (Page 19)	D. Total quantity shipped in ~~1988~~ 1990 (Page 19)
Site 1	O H D 9 8 0 5 6 8 9 9 2	M	3 2 2
Site 2	P A D 0 0 4 8 3 5 1 4 6	M	3 6

Sec. IV

A. Waste minimization results in ~~1989~~ 1990 (Instruction Page 20)
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 21)	C. Other effects (Page 21)	D. Quantity recycled in 1989 due to new activities (Page 21)	E. Activity/Production Index (Page 21)	F. Source Reduction Quantity (Page 22)
W W W W	☐ 1 Yes ☐ 2 No			

Comments:

Att "F-3"

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Wheeling-Pittsburgh Steel Corp.
Beech Bottom Plant

EPA ID NO.: WVD010079712 0

U.S. ENVIRONMENTAL PROTECTION AGENCY

1990 ~~1989~~ Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 15): Waste petroleum naptha generated from parts degreasing operations.

B. EPA hazardous waste code (Page 15): D001 D0118 D0139

C. State hazardous waste code (Page 16):

D. SIC code (Page 16): 3479

E. Source code (Page 16): A014

F. Form code (Page 16): B2111

G. Origin (Page 16): Code 1 — System type MINAI

H. TRI constituent (Page 17): 2

I. CAS numbers (Page 17): 1. 2. 3. 4. 5.

Sec. II

A. Quantity generated in ~~1988~~ (Instruction Page 17): 1989 6

B. Quantity generated in ~~1989~~ (Page 17): 1990 7

C. UOM (Page 18): 2

D. Density (Page 18): . ☐ 1 lbs/gal ☐ 2 sg

E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? (Page 18)
☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

SYSTEM 1
System type (Page 18): M
Quantity treated, disposed or recycled in 1989 (Page 18):

SYSTEM 2
System type (Page 18): M
Quantity treated, disposed or recycled in 1989 (Page 18):

Sec. III

A. Was this waste shipped off site? (Instruction Page 19)
☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped (Instruction Page 19)	C. System type (Page 19)	D. Total quantity shipped in ~~1989~~ 1990 (Page 19)
Site 1	WVD981034110 1	M021	7
Site 2		M	

Sec. IV

A. Waste minimization results in ~~1989~~ 1990 (Instruction Page 20)
☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 21)	C. Other effects (Page 21)	D. Quantity recycled in 1989 due to new activities (Page 21)	E. Activity/Production Index (Page 21)	F. Source Reduction Quantity (Page 22)
W W W W	☐ 1 Yes ☐ 2 No		.	

Comments: This waste stream is taken off-site for recycle.

ATT "F-4"

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: Wheeling-Pittsburgh Steel Corp.
Beech Bottom Plant

EPA ID NO.: WVD007977210

U.S. ENVIRONMENTAL PROTECTION AGENCY
1990
~~1989~~ Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description (Instruction Page 15): Used paint rags generated from a paint line.

B. EPA hazardous waste code (Page 15): D005, D035

C. State hazardous waste code (Page 16):

D. SIC code (Page 16): 3479

E. Source code (Page 16): A21

F. Form code (Page 16): B4019

G. Origin (Page 16): Code 1; System type M

H. TRI constituent (Page 17): 3

I. CAS numbers (Page 17): 1. 113310-20-7; 2. 7171-36-3; 3.; 4.; 5.

Sec. II

A. Quantity generated in ~~1989~~ (Instruction Page 17): 19

B. Quantity generated in ~~1990~~ 1990 (Page 17): 5

C. UOM (Page 18): 2

D. Density (Page 18): . ☐ 1 lbs/gal ☐ 2 sg

E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? (Page 18): ☐ 1 Yes (CONTINUE TO SYSTEM 1) ☒ 2 No (SKIP TO SEC. III)

SYSTEM 1
System type (Page 18): M
Quantity treated, disposed or recycled in 1989 (Page 18):

SYSTEM 2
System type (Page 18): M
Quantity treated, disposed or recycled in 1989 (Page 18):

Sec. III

A. Was this waste shipped off site? (Instruction Page 19) ☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (SKIP TO SEC. IV)

	B. EPA ID No. of facility to which waste was shipped (Instruction Page 19)	C. System type (Page 19)	D. Total quantity shipped in ~~1989~~ 1990 (Page 19)
Site 1	PAD085169059 12	M016 1	5
Site 2		M	

Sec. IV

A. Waste minimization results in ~~1989~~ 1990? (Instruction Page 20) ☐ 1 Yes (CONTINUE TO BOX B) ☒ 2 No (THIS FORM IS COMPLETE)

B. Activity (Page 21)	C. Other effects (Page 21)	D. Quantity recycled in 1989 due to new activities (Page 21)	E. Activity/Production Index (Page 21)	F. Source Reduction Quantity (Page 22)
W W / W W	☐ 1 Yes ☐ 2 No		.	

Comments: This waste stream is taken off-site and fuels blended.

Att F-5"

Hazardous Waste Emergency Response Fund
Fee Assessment Report

COMPANY NAME: Wheeling-Pittsburgh Steel Corp. EPA I.D. #: WVD000797720

GENERATOR LOCATION: Beech Bottom, W.Va.

1. The amount of hazardous wastes generated during the 1990 calendar year, excluding nonhazardous constituents. 1 Tons

2. The amount of hazardous wastes generated (from the amount determined in #1) that were treated or disposed of off-site, but remained hazardous. _____ Tons

3. The amount of hazardous wastes generated (from the amount determined in #1) that were treated or disposed of on-site, but remained hazardous. _____ Tons

4. The amount of hazardous wastes generated (from the amount determined in #1) that were treated off-site so that such wastes were rendered nonhazardous. _____ Tons

5. The amount of hazardous wastes generated (from the amount determined in #1) that were treated on-site so that such wastes were rendered nonhazardous. 1 Tons

6. Provide a brief narrative of the method(s) used to determine the amount given in #1, including method(s) used to determine the nonhazardous constituents.

7. If the total of items #2 through #5 is not equal to item #1, provide reasons for the difference.

CERTIFICATION:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Martin J. Stephenson — Print or Type Name

Env. Coord. I — Title

Signature of Authorized Representative

Date Signed

Att "F-6"

HAZARDOUS WASTE EMERGENCY RESPONSE FUND
FEE ASSESSMENT - 1990

Beech Bottom Plant

1. Waste Water Treatment Sludge

- Total weight shipped (Annual Report)	358 T
- Chromium hazardous constituent assume 0.28% Cr from 1989 & 1990 Analysis	
- Amount of hazardous constituents taken off-site to become non-hazardous	1 T

HOTO LOG

Company name WHEELING PITTSBURGH STEEL CORP Location WV RE 2, BEECH BOTTOM
Facility name BEECH BOTTOM PLANT Stream

1	2	3	4	5	6	7	8	9
1	KODAK 200 GOLD	AUTO	AUTO	LOW LIGHT INDOORS	COOL O/C	7JAN92 12:14	MID-BUILDING EAST WALL	DRUM #79 IDENTIFIED AS OIL SPILL CLEAN UP
2	" " "					12:15	" " " "	LABEL ON LID OF DRUM #79 PHOTO ABOVE
3	" " "					12:16	" " " "	UNLABELED DRUM ALSO MARKED #79
4	" " "					12:17	SOUTH EAST CORNER	OIL SPILLAGE & BOOM
5	" " "					12:21	MID-BUILDING EAST WALL	NOTE: NO AISLE SPACE

Photographer's signature J A GASTON

1. Photo number
*2. Film description (type, ASA, expiration date)
*3. Focal length of lens used
*4. F-Stop, Shutter speed
5. Lighting conditions
6. Weather
7. Date/Time
8. Location
9. Brief description of photo

*Not necessary for instant development film

FILM TURNED OVER TO _____ FOR DEVELOPING ON _____

PHOTOGRAPHS WERE RECEIVED ON _____ FROM DEVELOPER

Division of Waste Management
Compliance Assurance/Emergency Response
1356 Hansford Street
Charleston, WV 25301-1401
Phone: 304-558-5989 Fax: 304-558-0256

West Virginia Department of Environmental Protection

Bob Wise
Governor

Michael O. Callaghan
Secretary

Date: June 6, 2002

MEMORANDUM TO: File

SUBJECT: Referral to Enforcement without a Significant Noncomplier Code

FACILITY: Wheeling Corrugating Company

EPA ID#: WVD000797720

The violation being referred for administrative enforcement is not considered to be a Significant Non-Compliance because:

_____human health nor the environment has been adversely affected at this time.

/ _____it is procedural in nature. At this time it does not significantly affect the public health or the environment.

Division of Waste Management
Compliance Assurance and Emergency Response
2031 Pleasant Valley Run Road, Suite #1
Fairmont, WV 26554-9295
Phone 304-368-3950 Fax 304-368-3953

West Virginia Department of Environmental Protection

Bob Wise
Governor

Michael O. Callaghan
Secretary

June 5, 2002
CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Certified # 7099 3400 0008 2599 1545

Wheeling Corrugating Company
State Route 2
Beech Bottom, WV 26030

Attention: Pete Barren

Dear Mr. Barren:

Enclosed is a copy of the Compliance Evaluation Inspection Report completed by representatives of the Director from the Division of Waste Management. This report is based on the inspection conducted on April 22, 2002.

Please refer to the Notice of Violation for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following actions:

__X__ Notice of Violation (NOV)
__X__ Enforcement Referral

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. E.P.A.), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact Inspector Jamie Fenske at 304-238-1075.

Sincerely,

Stanley J. Moskal
Inspector Supervisor - Northern Unit
Compliance Assurance and Emergency Response
Division of Waste Management

SJM:st
Enclosures
cc: Naomi Henry, 3W31
Administrative Enforcement Unit
Jamie Fenske, Inspector
RCRA File

INSPECTION FACT SHEET

COMPANY NAME: Wheeling Corrugating Company

I.D.#: WVD000797720

MAILING ADDRESS: State Route 2
Beech Bottom, WV 26030

TYPE OF FACILITY: LQG

LOCATION: State Route 2, Beech Bottom

COUNTY: Brooke

COMPANY CONTACT: Pete Barren
Operations Manager

HANDLING CODES: S01

PHONE: (304) 234-4275

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act
Chapter 22, Article18;
West Virginia Administrative Regulations for Chapter 22-18
and/or 40 CFR Parts 260 thru 279.

LIST OF CHEMICALS: D001, D002, D006, D007, D008, D035, F003, F005

___ DETERMINATION PENDING

___ NOT APPLICABLE

X VIOLATIONS

___ NO VIOLATIONS

X ORDER

X AREAS OF CONCERN

DATE INSPECTED: April 22, 2002

INSPECTOR: Jamie Fenske
West Virginia DEP
Office of Waste Management
Wheeling Field Office

PREPARED BY: Jamie Fenske
Environmental Inspector

COMPLIANCE EVALUATION INSPECTION

RE: Wheeling Corrugating Company

EPA ID No: WVD000797720

DATE INSPECTED: April 22, 2002

INSPECTOR: Jamie Fenske, WV DEP-Division of Waste Management

PREPARED BY: Jamie Fenske
Environmental Inspector

On April 22, 2002 at approximately 0840 hours the above referenced inspector conducted a Compliance Evaluation Inspection of the Wheeling Corrugating Company located in Beech Bottom, WV.

Upon my arrival I was met by Pete Barren, Operations Manager and Richard Roy, Coil Coating Superintendent, who had not previously been advised of my intention to inspect the facility.

Upon presentation of the appropriate credentials, the company officials were informed of my authority as representative of the Director of the Division of Waste Management pursuant to Chapter 22 of the Code of West Virginia and as specified by Section 3007(a) of the Resource Conservation and Recovery Act; and they acknowledged my authority. The company official s were then informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 22, Article 18), and the regulations promulgated thereunder.

There have been a few changes at the facility since the last Compliance Evaluation Inspection. Mr. Howell is no longer the facility's environmental coordinator due to chronic health problems. During the course of the inspection, Patrick Smith, Environmental Engineer for the Wheeling Pittsburgh Steel's Mingo Junction, Ohio facility joined us. It should be noted that Mr. Roy and Mr. Smith are attempting to address environmental concerns at the Beech Bottom facility.

Trial runs are now being conducted on the facility's new paint line and the facility hopes to have this second paint line operational in a month. Since the previous inspection, the facility had the chromic acid concrete berm and sump coated with PPG acid resistant epoxy sealant. After some thought, I explained to the facility personnel that I still had some concerns regarding this area.

The biggest concern is within the sump itself (see Photo Log, Attachment H). A view of the vertical profile of the sump's deteriorated walls revealed how the concrete floor was poured in thick layers. Coating the sump walls probably would not totally prevent acid migration into *and* between the concrete floor layers. Once any chromic acid permeated in between the poured layers of concrete, it could then leach *both* vertically and horizontally for an extended distance. Also, the pitted and deteriorated sump walls are another concern as to how effective the sealant can work on such a surface. Finally, there is currently no way to verify or monitor if the sealant is being effective.

The facility proposed either eliminating the sump within the berm or installing an acid resistant tub where the concrete sump currently exists. *Chromic acid has a well documented affinity and record of leaching through unlined concrete sumps, floors, seams, and walls. The facility should submit additional plans to address this concern within thirty days receipt of this inspection report including a timetable on implementing the corrective action proposed.*

The used oil storage area was then inspected. Containers of used oil were found to be properly labeled, closed, and in good condition. The used oil tank was found to be properly labeled and appeared to have adequate secondary containment.

The next area inspected was the facility's hazardous waste drum storage building. All drums of hazardous waste located here were found to be properly labeled, dated, closed, and in good condition.

At the paint line satellite accumulation area, a drum of solvent and paint waste was found with no hazardous waste label. According to facility personnel, this container no longer needed a label because the solvent was recycled and much of the recycled solvent is returned to the Beech Bottom facility to be used again.

According to facility personnel, the first shipment of the used solvent was transported to Valspar Corporation. According to Jim Holmes of Valspar, the solvent is not reprocessed in any way and it is simply blended into a paint batch and returned to the customer. No wastes are generated according to Mr. Holmes.

The first shipment of used solvent that was transported to Valspar Corporation consisted of 70 drums on February 28, 2002. Attachment C is a copy of shipping paper.

No hazardous waste manifest was used to accompany the February 28, 2002 shipment of used solvent to Valspar Corporation. Valspar Corporation is not a permitted hazardous waste facility according to Mr. Holmes.

Facility personnel further explained that spent solvent is stored in the facility's paint bunker room. Approximately 63 drums of used solvent were observed in one corner of the paint bunker room (see Photo Log, Attachment H). The used solvent drums were not marked with the words "hazardous waste" or marked with the date of accumulation but were labeled "recycled material".

These 63 drums were initially to be transported to Valspar Corporation as well but facility personnel at the time of the inspection informed me they were no longer going to use Valspar Corporation.

Approximately 125 additional used solvent drums were located on the opposite end of the paint storage room. According to facility personnel, these drums are to be transported to Chemical Solvents, Inc. for reprocessing. To date, one shipment of 80 drums of used solvent has been transported to Chemical Solvents, Inc. for reprocessing. This shipment dated March 28, 2002 of used solvent was accompanied by a hazardous waste manifest (see Attachment D). Chemical Solvents, Inc. is listed as an "EPA Permitted Facility".

These drums were not marked with the words "hazardous waste" or the date of accumulation (see Photo Log, Attachment H). According to Mr. Smith, the containers would be properly labeled and dated by the following day.

On May 2, 2002 I again talked to Mr. Smith and he informed me that facility personnel may have been " premature" in declaring the approximately 188 drums of used solvent observed during the inspection in the paint bunker room as hazardous waste. According to Mr. Smith, the facility can at times re-utilize varying amounts of once used solvent again on the facility's coating line. Mr. Smith further explained that there are varying factors when determining when and if once used solvent can be utilized a second time including the type of product to be coated and space constraints in the paint storage room.

I informed Mr. Smith that this was a different explanation than what was provided during the inspection. I asked Mr. Smith exactly when and how is a drum or group of drums determined to be a waste and Mr. Smith informed me this is highly variable as well. Mr. Smith did inform me that the facility had to "bite the bullet" regarding the March 28, 2002 hazardous waste shipment of used solvent to Chemical Solvents, Inc. and this was primarily due to storage constraints. I further asked Mr. Smith if it is realistic to assume that Wheeling Corrugating Company will reuse all 188 drums observed during the inspection and he informed me that was a good question he could not answer.

Approximately five to ten drums of used solvent are generated per month at the Beech Bottom facility. Mr. Smith was not certain when or how many of the used solvent drums observed during the inspection would be re-used and how many would be managed as a hazardous waste.

On the hazardous waste manifest dated March 28, 2002 the used solvent/paint mixture is listed as EPA Waste Numbers D001 (ignitability) and D035 (methyl ethyl ketone). Attachment E is a copy of an undated waste determination provided by Wheeling Corrugating Company.

Attachment F is a copy of a letter dated April 30, 2002 and Attachment G is a copy of a letter dated May 17, 2002 which further explain the facility's position regarding the management of used solvent drums.

Based on the approximate rate of generation of the used solvent drums (five to ten drums per month), Wheeling Corrugating Company has been speculatively accumulating the used solvent.

Hazardous waste personnel training records were reviewed for one hourly employee and one salary employee and these records were found to be in order.

VIOLATIONS

1. Wheeling Corrugating Company failed to mark the date of accumulation on drums of hazardous waste in violation of 40 CFR Part 262.34(a)(2) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

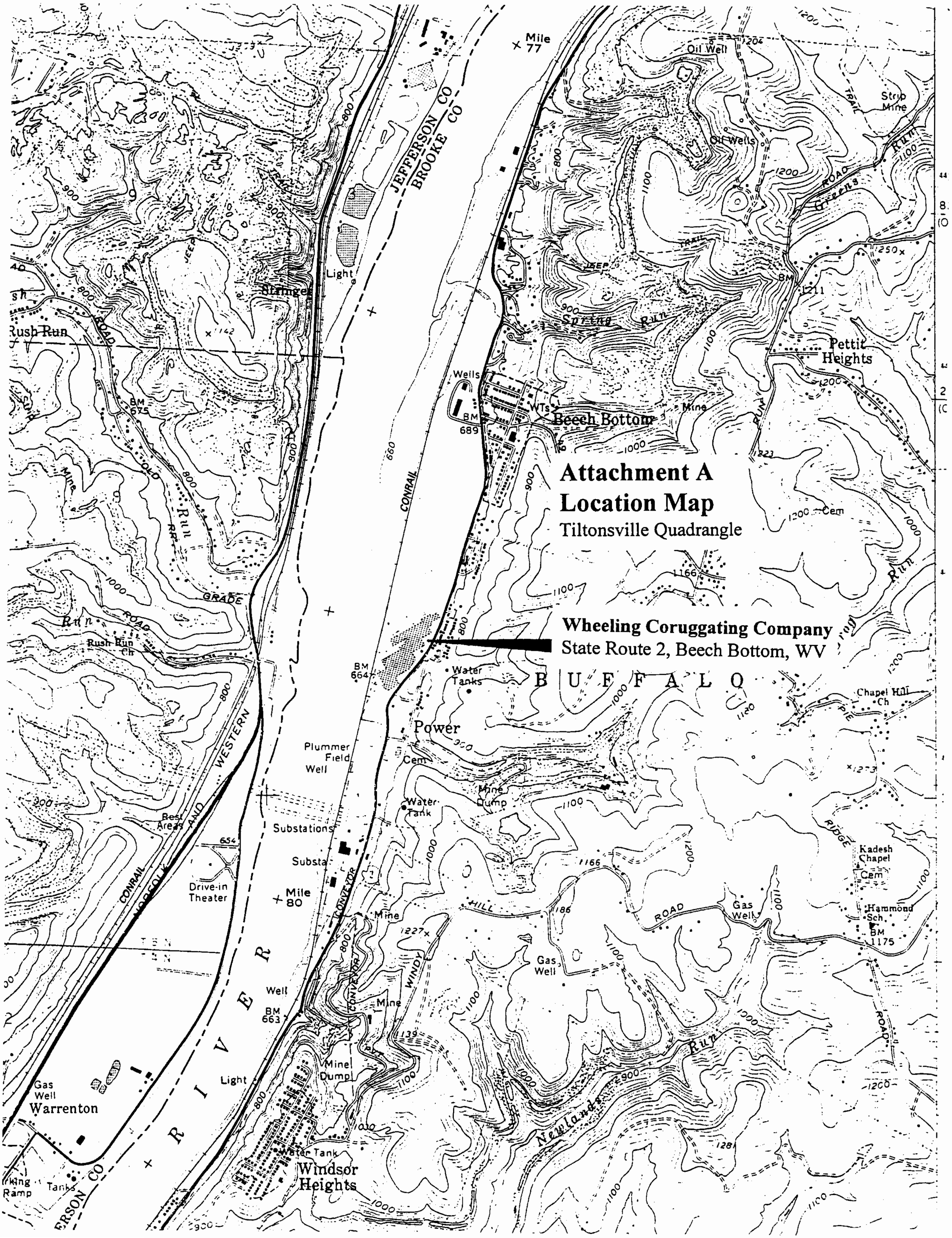
2. Wheeling Corrugating Company failed to label drums of hazardous waste with the words "hazardous waste" in violation of 40 CFR Part 262.34(a)(3) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

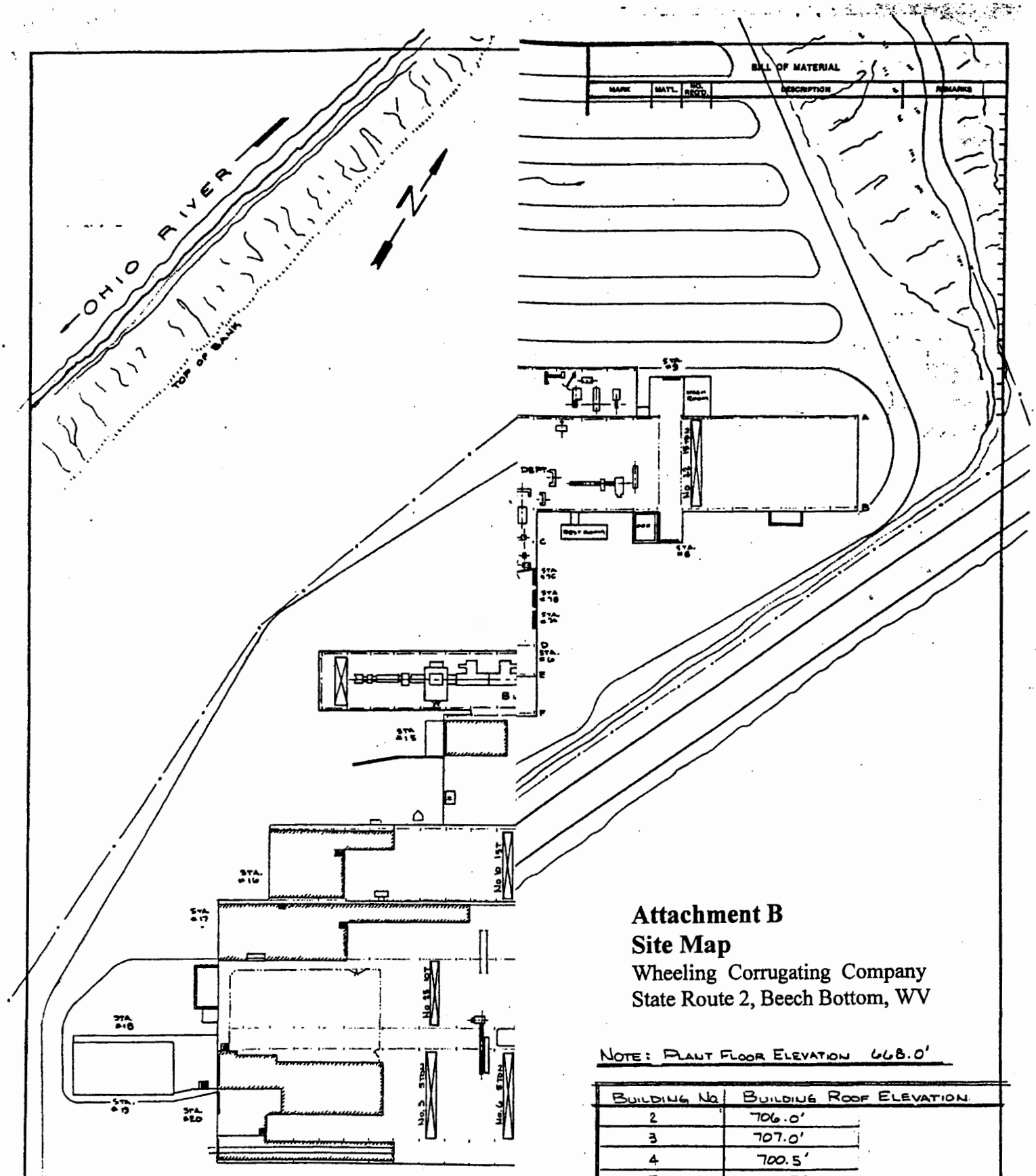
3. Wheeling Corrugating Company stored containers of hazardous waste for greater than ninety days without a permit in violation of 40 CFR Part 262.34(a) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

Areas of Concern

1. Additional remedial measures are necessary to address the threat of contamination at the coating line chromic acid sump. The facility should submit additional plans to address this concern within thirty days receipt of this inspection report including a timetable on implementing the corrective action proposed.

2. There are some concerns as to whether a hazardous waste manifest should have accompanied the February 28, 2002 shipment of 70 used solvent drums transported to Valspar Corporation.


Attachment A
Location Map
Tiltonsville Quadrangle
Wheeling Coruggating Company
State Route 2, Beech Bottom, WV
JEFFERSON CO
BROOKE CO
Mile 77
Oil Well
Strip Mine
Oil Wells
Greens Run
Light
Stringer
Rush Run
Spring Run
Pettit Heights
Wells
WTs
BM 689
Beech Bottom
Mine
BM 675
CONRAIL
Cem
GRADE
Rush Run Ch
BM 664
Water Tanks
B U F F A L O
Chapel Hill Ch
Power
Plummer Field Well
Cem
Mine Dump
Water Tank
Rest Areas
Substations
Substa
Kadesh Chapel
Cem
Drive-in Theater
Mile 80
Mine
HILL ROAD
Gas Well
Hammond Sch
BM 1175
NORFOLK AND WESTERN
Gas Well
Well
BM 663
Mine
WINDY
R I V E R
Mine Dump
Light
Gas Well
Warrenton
Newlands Run
Water Tank
Windsor Heights
Tanks
Ramp
ERSON CO



Attachment B
Site Map
Wheeling Corrugating Company
State Route 2, Beech Bottom, WV

NOTE: PLANT FLOOR ELEVATION 668.0'

BUILDING NO.	BUILDING ROOF ELEVATION
2	706.0'
3	707.0'
4	700.5'
5	701.5'
6	731.3'
7	732.5'
7A	718.0'
8	731.3'
9	715.0'
10	719.0'

REFERENCES	REVISIONS			
	MK.	BY	DATE	DESCRIPTION

BEECH BOTTOM PLANT LAYOUT
#2 COIL COATING LINE LOCATION
BEECH BOTTOM

MAY 17 '02 17:09 FR WHEELING CORR CONTROL 740 283 3779 TO 913842301000 P.03/06

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading.

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said [illegible] (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its [illegible] to deliver to another carrier on the route to said destination. It is [illegible] agreed, as to each carrier of all or any of said property, over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CARRIER'S NO.

FROM
AT Wheeling Corrugating Company
A DIVISION OF WHEELING-PITTSBURGH STEEL CORPORATION

Attachment C

BEECH BOTTOM, WV 26030 PLANT

SHIPPER'S NUMBER MUST BE SHOWN ON ALL FREIGHT BILLS AND/OR CORRESPONDENCE.

Subject to Section 7 of conditions, if applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

RFB

Wheeling Corrugating Company
(Signature of consignor.)

If charges are to be prepaid, write or stamp here, "To be Prepaid."
PREPAID

Rec'd $

apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid.)

Charges advanced:
$

DATE	NAME OF CARRIER	SHIPPER'S NUMBER	ORDER NUMBER
02-28-02	LANDSTAR RANGER	#004	

CONSIGNED TO (Mail or street address of consignee—For purposes of notification only.)

VALSPAR CORPORATION

DESTINATION	STATE	COUNTY
901 NORTH GREENWOOD AVENUE	KANKAKEE, IL	60901

DELIVERY ADDRESS (To be filled in only when shipper desires and governing tariffs provide for delivery thereof.)

ROUTE	DELIVERING CARRIER
LANDSTAR RANGER	

CAR OR BARGE INITIAL & NUMBER	TYPE OF CAR	LENGTH OF CAR Ordered	LENGTH OF CAR Furnished	CAPACITY OF CAR Ordered	CAPACITY OF CAR Furnished	VEHICLE LICENSE

Number Packages	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	*Shipper's Weight Subject to Correction	Class or Rate	✓
70 DRUMS	PAINT RELATED MATERIAL, SOLVENT, THINNER UN #1263 HAZARDOUS CLASS-3 FOR CHEMICAL EMERGENCY SPILL, LEAK, FIRE, EXPOSURE OR ACCIDENT CALL DAY OR NIGHT 1 - 888 - 748 - 5558 SEND FREIGHT BILL TO: WHEELING CORRUGATING COMPANY P.O. BOX 37 BEECH BOTTOM, WV 26030 VAKS VALSPAR 1-815-936-7869 REC HOURS: 7AM TO 2PM M-F PLACARDS: FLAMMABLE LIQUID	~~29,700~~ 28,875.00		

TRUCK DEPARTED	PATROLMAN	DRIVER'S SIGNATURE	GROSS WEIGHT	NET WEIGHT
AM PM		Rene Mirsha		28875.00

*This shipment is correctly described.

Correct Weight is shown above and is Subject to Verification by the Eastern Weighing and Inspection Bureau According to Agreement.

†"Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission."

†† If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is "carrier's or shipper's weight."
NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

per

For Wheeling Corrugating Company, Shipper
A Division of Wheeling-Pittsburgh Steel Corporation

Agent, Per

Permanent post office address of shipper, 1134 MARKET ST., WHEELING, W. VA. 26003

LOADING OF IRON AND STEEL OR HIGHWAY VEHICLES
That the material described hereon was loaded and braced to conform to my instructions and that I am legally able to transport the net weight tendered.

CARRIER

AGENT, Per (Driver's Signature)

†The Fibre Boxes used for this shipping conform the specifications set forth in the box maker's certificate thereon, and all other requirements of Uniform Freight Classification.

ORIGINAL BILL OF LADING

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Attachment D

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

WVD000029272 | 32802

3. Generator's Name and Mailing Address
WHEELING CORRUGATED
ROUTE 2
BEECH BOTTOM, WV 26030

4. Generator's Phone( ) 304-234-4214

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name: CHEMICAL SOLVENTS, INC
6. US EPA ID Number: OHD052937815
C. State Transporter's ID
D. Transporter's Phone: 216 741-9310

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CHEMICAL SOLVENTS, INC.
1010 DENISON AVENUE
CLEVELAND, OH 44109
10. US EPA ID Number: OHD980819716
G. State Facility's ID
H. Facility's Phone: ~~02-18-0669~~ 216 741-9310

	11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ WASTE PAINT RELATED MATERIAL,3,UN1263,PGIII RQ(0001) ERG #128 CSI #20913	X	080	DM	04400	G	D001 D035
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: T50

15. Special Handling Instructions and Additional Information: EMERGENCY RESPONSE PHONE NUMBER: 800 424-9300

LOADED ON V-15

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Type Name	Signature	Month Day Year
X John Cramer	X John Cramer	03 21 92

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Type Name	Signature	Month Day Year
Kenny G. Lee	Kenny Glee	03 21 92

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Type Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Type Name	Signature	Month Day Year
MIKE STANCZYK	Mike Stanczyk	04 02 92

Attachment E

CHEMICAL SOLVENTS, INC. 1010 DENNISON AVE. PH: (216)741-9310
CUSTOMER PROFILE SHEET CLEVELAND, OH 44109 FAX: (216)459-0737

ANALYTICAL CHARGE: .00 PROFILE NUMBER: 020913

A. GENERATOR INFORMATION		BILLING ADDRESS
NAME:	WHEELING CORRUGATED	SAME
ADDRESS:	ROUTE 2	
	BEECH BOTTOM WV 26030	
US EPA ID #:	WVD000797720	
TECHNICAL CONTACT:	RICH ROY	
TITLE:		
PHONE:	304-234-4214	
CSI CUST#	983820	

B. GENERAL WASTE INFORMATION

WASTE DESCRIPTION:	PAINT & SOLVENT 100	WASTEWATER TREATMENT CODE:	N/A
PROCESS GENERATING WASTE:	PAINT CLEANUP	SIC NUMBER :	
ANTICIPATED VOLUME:		METHOD OF SHIPMENT:	
FREQUENCY OF SHIPMENT:		DISPOSITION:	DISPOSAL

C. PHYSICAL PROPERTIES

APPEARANCE :	VARIES	ODOR :	SOLVENT
PHYSICAL STATE AT 70F:	LIQUID	LAYERS:	SINGLE PHASE
TOTAL SOLIDS & NON VOLATILES:	20 %	RECOVERY RATE:	80
SPECIFIC GRAVITY:	0.9	PH:	
WATER LAYER (% OF RECOV):		FLASH POINT (TCC-F):	105
WATER CONTENT (DISSOLVED):		BTU PER POUND:	12500
CHLORINE BY FLAME:	NONE	CHLORINE BY BOMB:	
FTIR IDENT OF NVM RESIDUE:			
COMPATABILITY :	MIXES WITH FUEL	GORATEABILITY :	PUMPABLE

D. CHEMICAL COMPOSITION

RANGE%		NAME	RANGE%		NAME
.0-	1.0	METHANOL	.8	2.0	ACETONE
.0-	4.0	METHYL ETHYL KETONE	.8	4.0	N-BUTYL ALCOHOL
.0-	20.0	VM&P NAPHTHA	68.8	100.0	SOLVENT 100
.0-	30.0	PAINT RESINS & PIGMENTS	.8	.0	

E. RCRA INFORMATION

F THIS WASTE IS HAZARDOUS AS DEFINED BY RCRA IN 40 CFR 261 (D.A.C. RULE 3741-51), PLEASE PROVIDE THE APPROPRIATE
PA WASTE CODES:
D001 D035

F. SHIPPING INFORMATION

DOT PROPER SHIPPING NAME: WASTE PAINT RELATED MATERIAL, 3, UN1263, PGIII RQ(D001)
DOT REPORTABLE QUANTITY : 100 LB

TCLP INFORMATION

G. METALS (PPM)

COMPOUND	RCRA CODE	REG LIMIT	RESULTS	COMPOUND	RCRA CODE	REG LIMIT	RESULTS
ARSENIC :	D004	5.0	< 5.0	LEAD :	D008	5.0	< 5.0
BARIUM :	D005	100.0	<100.0	MERCURY :	D009	0.2	< 0.2
CADMIUM :	D006	1.0	< 1.0	SELENIUM :	D010	1.0	< 1.0
CHROMIUM :	D007	5.0	< 5.0	SILVER :	D011	5.0	< 5.0

H. VOLATILE ORGANICS (PPM)

COMPOUND	RCRA CODE	REG LIMIT	RESULTS	COMPOUND	RCRA CODE	REG LIMIT	RESULTS
BENZENE :	D018	0.5	< 0.5	1,1 DICHLOROETHYLENE :	D029	0.7	< 0.7
CARBON TETRACHLORIDE :	D019	0.5	< 0.5	METHYL ETHYL KETONE :	D035	200.0	>200.0
CHLOROBENZENE :	D021	100.0	<100.0	TETRACHLOROETHYLENE :	D039	0.7	< 0.7
CHLOROFORM :	D022	6.0	< 6.0	TRICHLOROETHLYENE :	D040	0.5	< 0.5
1,2 DICHLOROETHANE :	D028	0.5	< 0.5	VINYL CHLORIDE :	D043	0.2	< 0.2

I. SEMI-VOLATILE ORGANICS (PPM)

COMPOUND	RCRA CODE	REG LIMIT	RESULTS	COMPOUND	RCRA CODE	REG LIMIT	RESULTS
O - CRESOL :	D023	200.0	<200.0	HEXACHLORO 1,3 BUTADIENE :	D033	0.5	< 0.5
M - CRESOL :	D024	200.0	<200.0	HEXACHLOROETHANE :	D034	3.0	< 3.0
P - CRESOL :	D025	200.0	<200.0	NITROBENZENE :	D036	2.0	< 2.0
CRESOL :	D026	200.0	<200.0	PENTACHLOROPHENOL :	D037	100.0	<100.0
1,4 DICHLOROBENZENE :	D027	7.5	< 7.5	PYRIDINE :	D038	5.0	< 5.0
2,4 DINITROTOLUENE :	D030	0.13	< 0.13	2,4,5 TRICHLOROPHENOL:	D041	400.0	<400.0
HEXACHLOROBENZENE :	D032	0.13	< 0.13	2,4,6 TRICHLOROPHENOL:	D042	0.2	< 2.0

J. PESTICIDES AND HERBICIDES (PPM)

COMPOUND	RCRA CODE	REG LIMIT	RESULTS	COMPOUND	RCRA CODE	REG LIMIT	RESULTS
CHLORDANE :	D020	0.03	< 0.03	LINDANE :	D013	0.4	< 0.4
2,4 D :	D016	10.0	< 10.0	METHOXYCHLOR :	D014	10.0	< 10.0
ENDRIN :	D012	0.02	< 0.02	TOXAPHENE :	D015	0.5	< 0.5
HEPTACHLOR :	D031	0.008	<0.008	2,4,5 TP (SILVEX) :	D017	1.0	< 1.0

K. GENERATOR'S CERTIFICATION

I HEREBY CERTIFY THAT THE INFORMATION PRESENTED ON THIS FORM IS FACTUAL AND REPRESENTITIVE, THAT NO INFORMATION HAS BEEN WILLFULLY WITHHELD AND THAT ALL HAZARDS ASSOCIATED WITH THE DESCRIBED MATERIAL HAVE BEEN DISCLOSED.

SIGNATURE: PRINTED NAME:

TITLE: DATE:

CST APPROVAL DATE: 11/12/01 APPROVED BY: CAR RECERTIFICATION DATE: 10/02

Attachment F

PATRICK J. SMITH
Environmental Engineer

Wheeling Pittsburgh
STEEL CORPORATION

(740) 283-5542

April 30, 2002

Mr. Jamie Fenske
Environmental Inspector
Office of Waste Management
1060 Chapline Street
Wheeling, WV 26003-2955

RE: April 22, 2002 Hazardous Waste Inspection Information Request
Wheeling Corrugating Company
Beech Bottom Plant

Dear Mr. Fenske:

This correspondence contains items you had requested during the Hazardous Waste Inspection you conducted at the Wheeling Corrugating Company Beech Bottom plant on April 22, 2002.

Attached are the following:

1) Hazardous waste training attendance sheets for John Cramer and Rich Roy
2) Hazardous waste training Scope of Work, including topics covered.

You had also requested records for Arnold Negri. In reviewing our 2001 training records, we discovered that Mr. Negri did not attend one of the scheduled sessions. We will plan a training session for Mr. Negri as soon as possible to meet this requirement.

Shortly following the inspection, I discussed with you the status of the used solvent stored in drums in the paint house. At the time, I gave you an explanation based on incomplete information. In further discussing this material with plant management, we have determined that the used solvent material meets plant requirements as a "blending agent" to keep paints in proper suspension. Recently, in preparation for starting up our new paint line, it was necessary to ship some of these drums to accommodate our need for additional storage space. Therefore, they were properly labeled, and shipped as a hazardous waste to Chemical Solvents, Inc. (CSI). This does not, however, affect our ability to use the remaining used solvents back into our process. Therefore, we are managing the used solvents as a raw material. In the event the decision is made to send additional material to CSI, it will likewise be managed as a hazardous waste, and labeled as required.

If you have any questions regarding this submittal, please contact me at (740) 283-5542.

Sincerely,

Patrick J. Smith
Environmental Engineer

Attachments:

cc: R. Roy
H. Barren
M. O'Leary
PJS/ECSF
BES/TJW
BBECMF 1.4.7

ECMF/BB/WASTE/2002JF.DOC

Attachment G

PATRICK J. SMITH
Environmental Engineer

(740) 283-5542

Wheeling Corrugating Company
A DIVISION OF WHEELING-PITTSBURGH STEEL CORPORATION
Since 1890

May 17, 2002

Mr. Jamie Fenske
Environmental Inspector
Office of Waste Management
1060 Chapline Street
Wheeling, WV 26003-2955

RE: April 22, 2002 Hazardous Waste Inspection
Second Information Request
Wheeling Corrugating Company
Beech Bottom Plant

Dear Mr. Fenske:

This correspondence contains items you had requested as a verbal follow up from the Hazardous Waste Inspection you conducted at the Wheeling Corrugating Company Beech Bottom plant on April 22, 2002.

Attached are the following:

1) February 28, 2002 Shipping Paper for a shipment of used solvent to Valspar Corporation
2) The "Customer Profile Sheet" from Chemical Solvents, Inc. for used solvent shipped as waste

You also requested an estimate for the average number of used solvent drums generated. Plant personnel have indicated to me that approx. 5 – 10 drums are generated per month. As I indicated in previous correspondence, the contents of these drums are suitable for reuse at the Paint line, and they are not normally shipped off site until they are determined by plant management to be unfit for on-site use, or other business considerations dictate. In the case of the recent shipment to CSI, space for incoming paint became a business consideration that caused us to decide to send a shipment of drums off-site. Other considerations involve returning them to paint suppliers who can also blend them into paint products, or solvent reclaimers (such as CSI) who can return a reclaimed solvent product to the Beech Bottom plant. Wheeling Corrugating Company feels these efforts are in concert with the waste minimization/pollution prevention hierarchy proposed by USEPA and WVDEP. Based on your concerns, however, we are evaluating a program for routinely managing these used solvents off-site.

Lastly, I have included recent hazardous waste training record for Arnold Negri, who recently completed this training. We believe we have now trained all personnel required to receive this training.

If you have any questions regarding this submittal, please contact me at (740) 283-5542.

Sincerely,

Patrick J. Smith
Environmental Engineer

Attachments: Shipping Paper to Valspar
CSI Profile
Hazardous Waste Training Attendance Sheet

cc: R. Roy
H. Barren
M. O'Leary
PJS/ECSF
BES/TJW/ECMF 1.4.8
BBECMF 1.4.7

ECMF/BB/WASTE/2002JF-2.DOC

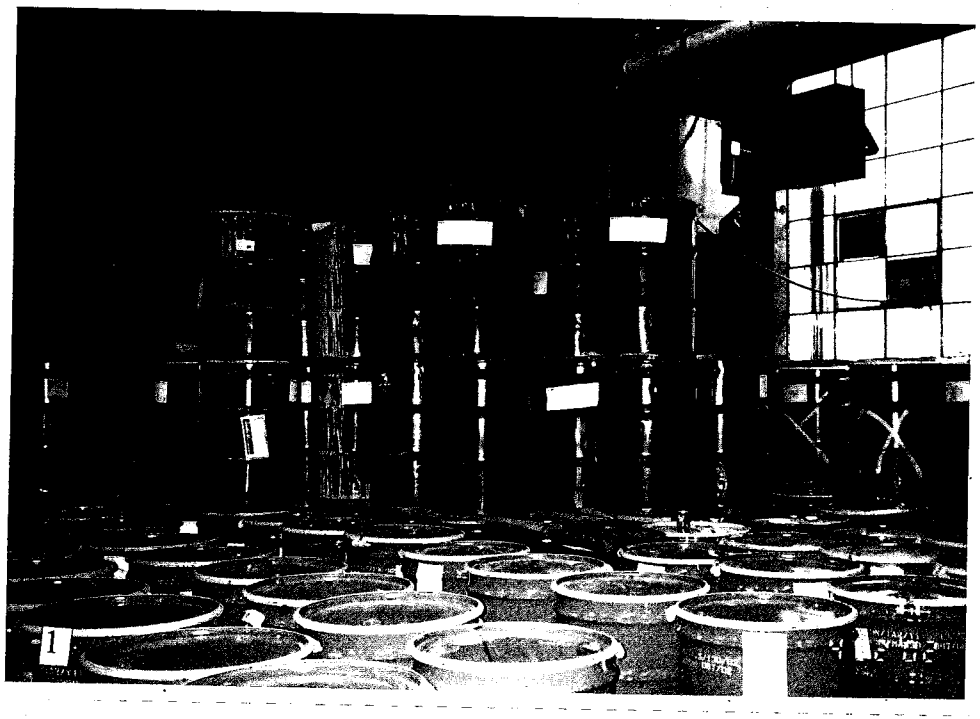
Attachment H

PHOTO LOG

Facility: Wheeling Corrugating Company **Location**: Beech Bottom Facility

Photo#	Date	Time	Lighting	Description
1	04-22-02	10:45	Indoor	Approx. 63 drums (black containers) of used solvent initially scheduled to be shipped to Valspar Corporation
2	04-22-02	10:49	Indoor	Approx. 125 drums (primarily black containers) of used solvent initially scheduled to be manifested to Chemical Solvents, Inc.
3	04-22-02	10:49	Indoor	Approx. 125 drums (black and gray containers) of used solvent initially scheduled to be manifested to Chemical Solvents, Inc.
4	04-22-02	10:10	Indoor	Chromic Acid Sump on Coil Coating Line

Film Description: Fuji 200
Date Photos Taken: April 22, 2002
Focal Length of Lens: Automatic Camera
Photographer: Jamie Fenske
Developer: Newbrough's Photo
Log Prepared By: Jamie Fenske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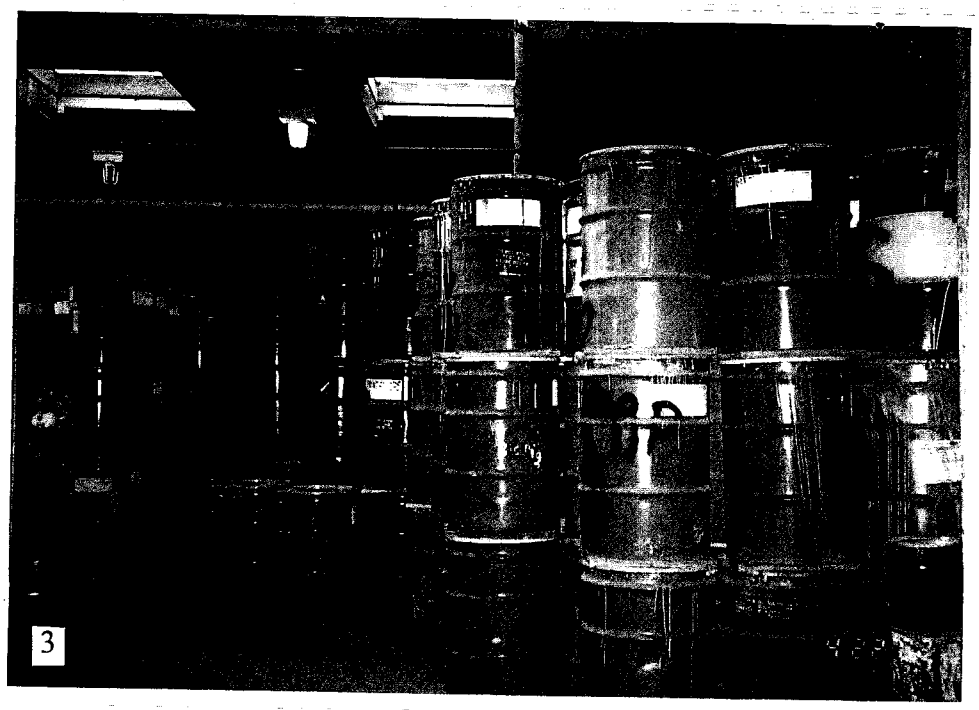
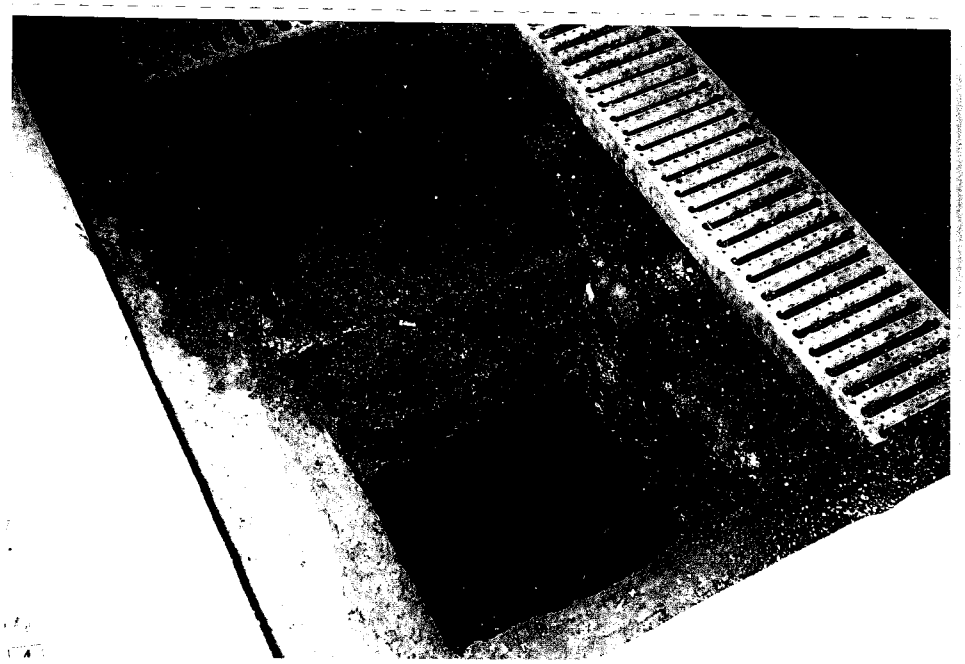
2


3



BUREAU OF ENVIRONMENT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB WISE
GOVERNOR

Division of Waste Management

MICHAEL O. CALLAGHAN
SECRETARY

NOTICE OF VIOLATION

DATE: April 22, 2002 TIME: 0840 hours

ISSUED TO: Wheeling Corrugating Company

EPA I.D.#: WVD000797720

FACILITY MAILING ADDRESS: State Route 2, Beech Bottom, WV 26030

FACILITY REPRESENTATIVE: Pete Barren, Operations Manager

On the date and time specified, an authorized agent of the Director of the Division of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

1.A. (Regulation) 40 CFR Part 262.34(a)(2) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

B. (Facts) Wheeling Corrugating Company failed to mark the date of accumulation on drums of hazardous waste.

2.A. 40 CFR Part 262.34(a)(3) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

B. Wheeling Corrugating Company failed to label drums of hazardous waste with the words "hazardous waste"

3.A. 40 CFR Part 262.34(a) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

B. Wheeling Corrugating Company stored drums of hazardous waste for greater than ninety days without a hazardous waste permit.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

(1) Immediately ensure all containers of hazardous waste are properly labeled and dated.

(2) Immediately ensure all containers of hazardous waste are stored on site for not longer than ninety days, and the facility does not speculatively accumulate containers of used solvent.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Division of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 238 - 1075 Issued By: Jamie Fowler

District Fax: (304) 238 - 1006 Title: Environmental Inspector

WVD 000 79 7720
Gen

STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1260 Greenbrier Street
Charleston, West Virginia 25311

ARCH A. MOORE, JR.
Governor

RONALD R. POTESTA
Director

ROBERT K. PARSONS
Deputy Director

December 12, 1988

Ms. Nancy Ray
Wheeling-Pittsburgh Steel Corp.
Route 2
Beech Bottom, West Virginia 26030

Dear Ms. Ray:

Enclosed is a copy of the "Compliance Evaluation Inspection" (CEI) Report completed on your facility by representatives of the Chief of the Division of Waste Management. This report is based on the inspection conducted on October 19, 1988.

Please refer to the "Compliance Evaluation" section of the report for those violations discovered during the course of this inspection.

A copy of this report will be referred to the Enforcement Unit of this Division with an additional copy transmitted to the United States Environmental Protection Agency (U. S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at 304/348-5929.

Sincerely,

Ava C. Zeitz

Ava C. Zeitz
Compliance Monitoring and
Enforcement Section Leader

ACZ/pd
Enclosure
cc: Doug Donor, EPA, Region III
John Meeks, Enforcement Unit
David Swisher, Inspector

RCRA COMPLIANCE SECTION
RECEIVED
DEC 28 1988

INSPECTION FACT SHEET

COMPANY NAME: Wheeling-Pittsburgh Steel I.D. #: WVD000797720

MAILING ADDRESS: Rt. 2
Beech Bottom, WV 26030

TYPE OF FACILITY: Generator

LOCATION: Beech Bottom Plant

COUNTY: Brooke

COMPANY CONTACT: Nancy Ray
Environmental Coordinator

HANDLING CODES: S01

PHONE: (304) 234-2672

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E; West Virginia Administrative Regulations for Chapter 20-5E; and/or 40 CFR Part 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

D001 F003
D007 F005

DATE INSPECTED: October 19, 1987

INSPECTOR(S): (1) David B. Swisher, West Virginia Department of Natural Resources, Division of Waste Management

(2)

(3)

DATE PREPARED: October 25, 1988

PREPARED BY: David B. Swisher, Division of Waste Management

INSPECTION REPORT

COMPANY: Wheeling-Pittsburgh Steel Corporation

DATE INSPECTED: October 19, 1988

INSPECTOR: David B. Swisher, West Virginia Department of Natural Resources, Division of Waste Management

DATE PREPARED: October 25, 1988

PREPARED BY: David B. Swisher, Division of Waste Management

On October 19, 1988 the above referenced inspector ccnducted a Compliance Evaluation Inspection of Wheeling-Pittsburgh Steel, Beech Bottom Plant. Upon my arrival at 1015 hours I was met by Steve Beacroft, Plant Manager and Tom Waligura, Environmental Control.

Upon presentation of appropriate credentials, I advised the officials of my authority as a representative of the Chief of the Division of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and they acknowledged my authority. The facility representatives were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

There have been no changes in hazardous waste operations at this facility since the last CEI (October 20, 1987). Hazardous waste is generated as a result of cleaning and surface preparation of steel coils.

This inspection consisted mainly of a visual walk through of the facility. The regular facility representatives; Nancy Ray, Environmental Control and Jim Allen, Engineering Department, were not available on the day of this inspection, therefore, the facility's records were not available for inspection (facility representatives did not know the location of the records). Mr. Beacroft, Plant Manager, indicated that Mr. Allen would return to work on Monday, October 24, and that the records would be available for inspection at that time.

The inspection began with observation of the coil coating line. Located on the line is the paint filtering room. This room is a satellite accumulation area for the facility's waste paint/solvent and waste rags/paint filters. Ed Maciak, Paint Line Foreman, indicated that approximately 4 days are required to fill one drum of waste. At the time of this inspection, there was 1 drum being filled, and 3 full drums sitting outside the room. These drums had not been moved to the drum storage area. I advised Mr. Maciak that there is a 3-day time limit on moving drums from a satellite area to the storage area.

From the coating line, we proceeded to the drum storage area. Located inside the storage buildings were 88 drums of hazardous waste, 63 drums of waste oil, and 1 drum of asbestos waste. Also in the building were several empty drums designated for return.

The 88 drums of hazardous waste are comprised of waste paint (described as "obsolete" by factory reps.), waste rags, and paint filters. The paint filters are actually cloth "bags" which trap paint solids so that the filtered paint may be reused. The contents of the drums containing the paint filters are mostly liquid materials.

Inspection of the drum storage area revealed 38 drums stored for over 90 days, 11 drums that were not labelled, and 11 drums which had no date on the label. Some of the dates on the drums went back to February, '88.

Mr. Maciak explained that when a drum of hazardous waste is brought into the storage area, they paint the drum black and then place a hazardous waste label on it. It appears that this practice may be causing a delay in getting labels on the drums. This is apparent due to the fact that there were 16 drums of waste "obsolete" paint located in the storage area, 5 of which had been painted black and were labelled. The remaining 11 drums had not been painted and consequently, were not labelled or dated.

As earlier stated, one drum of hazardous waste is generated about every 4 days. Given the 3-day time period to move the drum into storage, one would expect the dates on the drums to be approximately a week apart. However, this is not the case. Inspection shows that there are several drums being labelled on the same date. Although the dates are somewhat erratic, it appears that labels are being placed on drums approximately every 2-2½ weeks. Based on these observations and the label/date discrepancies, Wheeling- Pittsburgh should examine their drum handling procedures and adjust them accordingly.

Inspection of the wastewater treatment plant showed no change since the last CEI.

The rolloff container used to accumulate WWTP sludge (D007) meets the definition of a container as defined by the West Virginia Hazardous Waste Management Regulations, and therefore, should be labelled with the words "Hazardous Waste".

Following the visual inspection of the plant, I departed the facility with the understanding between myself and the facility representatives that I would return the following week to conduct the file review.

On Monday, October 24, 1988 I attempted to contact Nancy Ray, Environmental Control, to set up an appointment to conduct the remainder of the CEI. I was informed that Ms. Ray was out of the office for the entire week. At that point, I contacted Mr. Steve Beacroft, Plant Manager, and informed him that I would be at the plant site on Tuesday, October 25, 1988 at 1000 hours to complete the inspection. Mr. Beacroft indicated that he would not be in the plant that day, nor would Mr. Allen or Mr. Maciak. I advised Mr. Beacroft that I could not delay the inspection any further, and that if he would not be there, he was to ensure that the appropriate records would be available for my review. Mr. Beacroft agreed.

On Tuesday, October 25, 1988 I received a call from Mr. Beacroft's secretary prior to the time of the inspection. She stated that Mr. Beacroft was off sick and that she could not locate any of the records for the inspection. Apparently, a portion of the manifests were given to the gate guard for my inspection. However, he did not have all of the manifests, nor did he have access to any of the other files. I was asked to postpone my inspection until someone was available who had "authority" to provide me with the necessary records. Repeated attempts to contact someone in Environmental Control were unsuccessful.

Based on this situation, and my repeated efforts to gain access to the facility records, I informed the facility personnel that I would not return at their convenience to inspect the files, and that I would simply note that the records were not available for inspection nor could they be located by facility representatives.

At that point, I considered the inspection concluded.

Compliance Evaluation

The following violations of the West Virginia Hazardous Waste Management Regulations (hereinafter "the Regulations") were noted during the inspection:

1) This facility has stored hazardous waste for more than 90 days without having a permit to do so and therefore, is in violation of Sections 6.3.5.b and 11.1 of the Regulations.

2) The date upon which each period of accumulation began was not marked on the hazardous waste containers. This is a violation of Section 6.3.5.a.2 of the Regulations.

3) While being accumulated on site, each container was not labelled "Hazardous Waste". This is a violation of Section 6.3.5.a.4 of the Regulations.

4) Containers of hazardous waste accumulated in the facility's satellite accumulation area were not moved into the drum storage area, labelled, and dated in accordance with Section 6.3.5.a within 3 days. This is a violation of Section 6.3.5.c.2 of the Regulations.

5) This facility did not make all records relating to the generation, transporation, storage, treatment or disposal of hazardous waste available for inspection and therefore, is in violation of Chapter 20, Article 5E-12(e) of the West Virginia Code.

6) The facility's contingency plan does not contain phone numbers or addresses for the emergency coordinators. This is a violation of 40 CFR 265.52(d) as referenced by Section 6.3.5.a.5 of the Regulations.

Concerns

The following concerns were raised during the inspection:

1) Drum handling procedures may be causing a delay in dating and labelling hazardous waste containers.

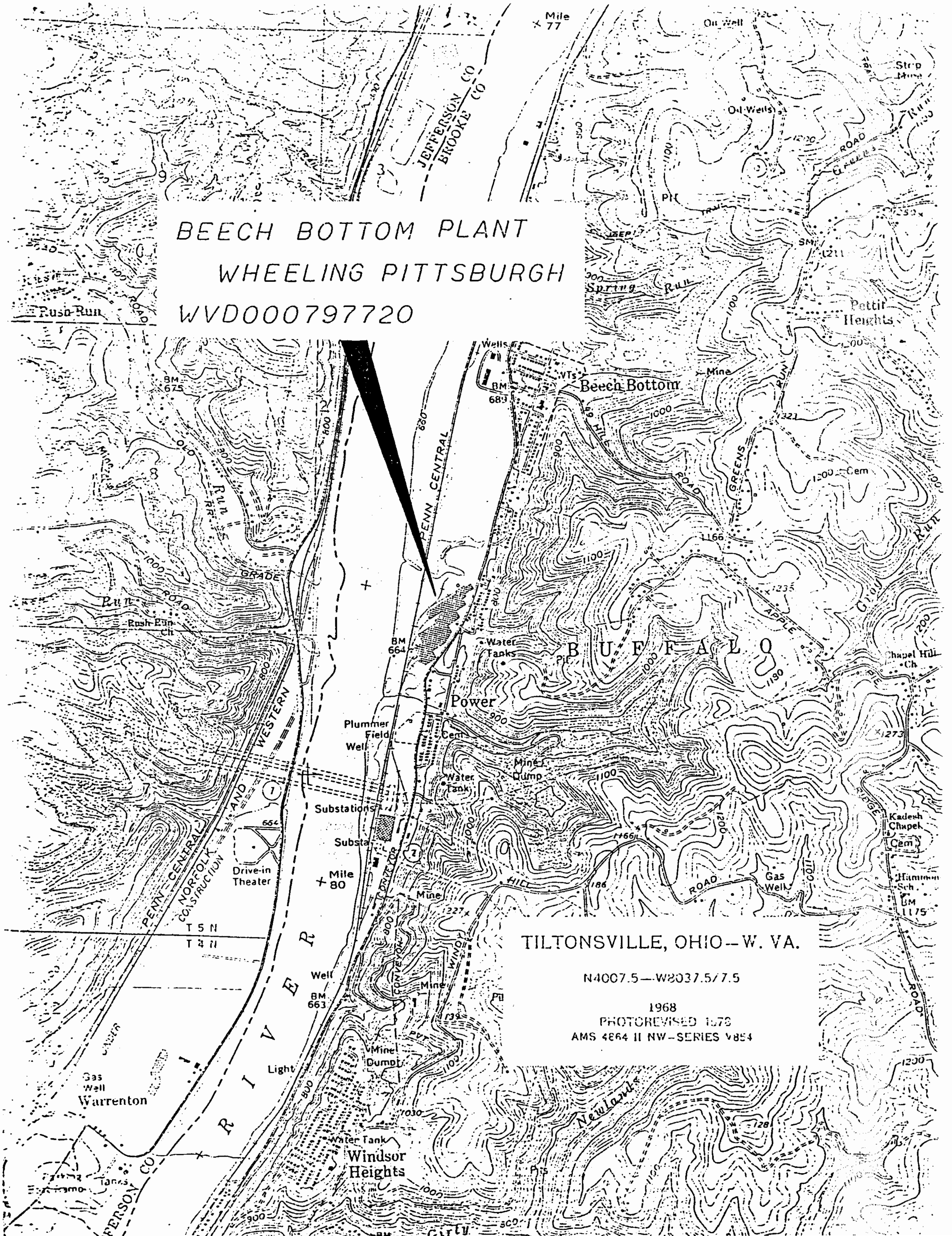
2) Based on the analysis of paint/solvent waste provided by Wheeling-Pittsburgh Steel during the last CEI (see October 21, 1987 supplemental memo), the material contains solvent wastes (F003, F005) in the range of 5-40%. However, Wheeling-Pittsburgh Steel maintains that based on their knowledge of the material and the process, the waste is properly classified as D001 (see response to notice of non-compliance dated January 26, 1988).

   It is this inspector's contention that the waste should be classified as F003, F005. A more detailed analysis will be needed to show insignificant concentrations of F-solvents.

3) According to the West Virginia Code, Chapter 20, Article 5E, an authorized representative of the Chief of the Division of Waste management may enter a facility at reasonable times for the purpose conducting an inspection. It is the responsibility of someone located on the facility premises to make all required records and documents available for inspection.

   While it is Wheeling-Pittsburgh Steel's policy to have a corporate environmental representative present for inspections, the company cannot expect the Division to postpone an inspection pending availability of the representative.

4) At the time of the inspection, the designated emergency coordinator was not familiar with the location of the facility's contingency plan.


BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720
TILTONSVILLE, OHIO—W. VA.
N4007.5—W8037.5/7.5
1968
PHOTOREVISED 1978
AMS 4864 II NW—SERIES V854
Beech Bottom
BUFFALO
Power
Windsor Heights
Warrenton
Pettit Heights
Plummer Field
Substations
Drive-in Theater
JEFFERSON CO
BROOKE CO
PENN CENTRAL
NORFOLK AND WESTERN
RIVER
Mile 80
Mile 77
Rush Run
Spring Run
Apple Grove
Chapel Hill Ch
Kadesh Chapel
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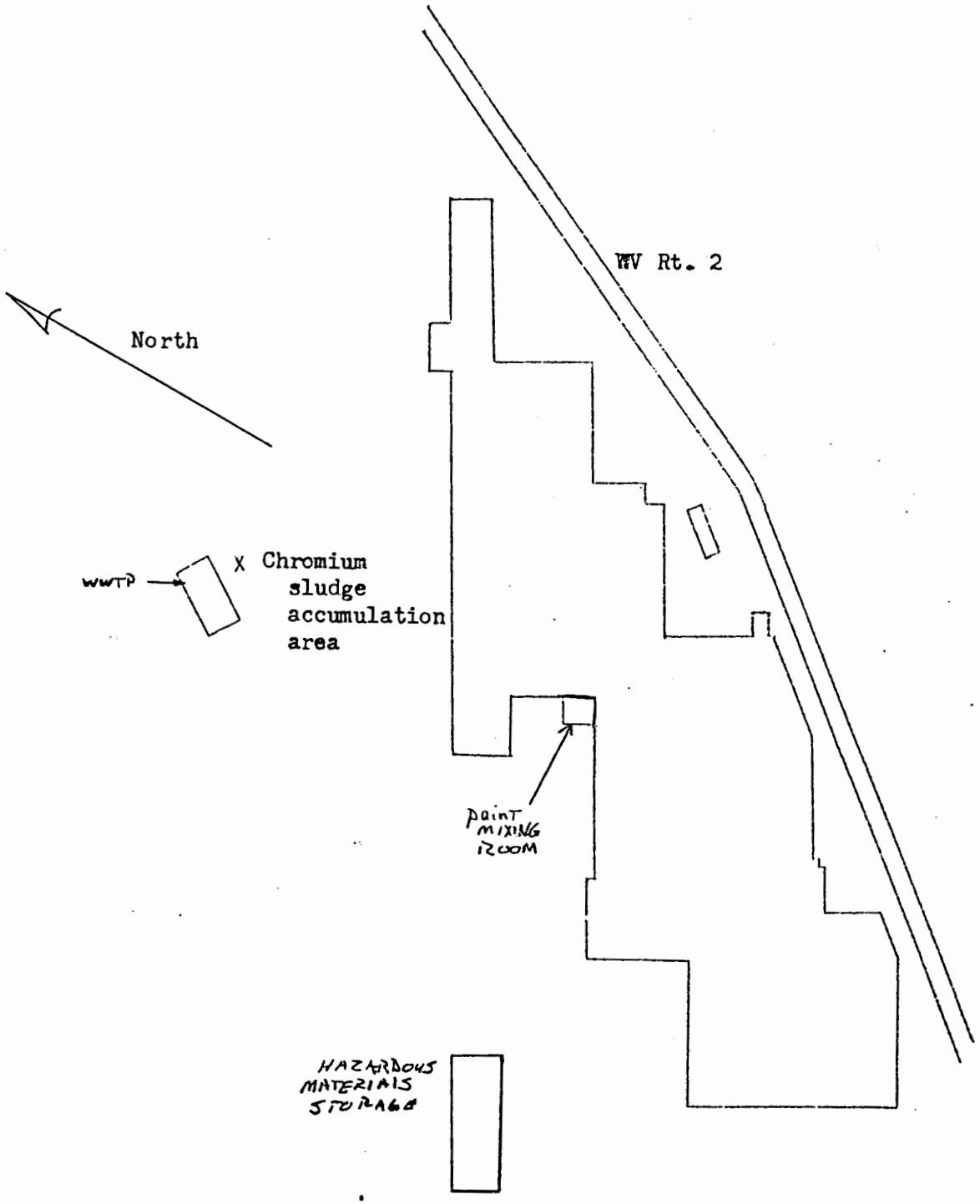
ATTACHMENT "B"

SITE MAP

BEECH BOTTOM PLANT

WHEELING PITTSBURGH

WVD000797720



* MAP NOT TO SCALE

WVD.00-079-7720
Gen

STATE OF WEST VIRGINIA
DEPARTMENT OF NATURAL RESOURCES
CHARLESTON 25305
DIVISION OF WASTE MANAGEMENT
1260 Greenbrier Street
Charleston, West Virginia 25311

GASTON CAPERTON
Governor

J. EDWARD HAMRICK III
Director

LARRY W. GEORGE
Deputy Director

ORDER

ISSUED UNDER THE
HAZARDOUS WASTE MANAGEMENT ACT
WEST VIRGINIA CODE, CHAPTER 20, ARTICLE 5E

Order Number HW-153-88

WVD 00 079 7720

TO: Wheeling-Pittsburgh Steel Corporation
Route 2
Beech Bottom, West Virginia 26030

ATTENTION: Ms. Nancy Ray

This Order is issued by the Chief of the Division of Waste Management (hereinafter "Chief"), under the authority of West Virginia Code, Chapter 20, Article 5E, Section 14 to Wheeling-Pittsburgh Steel Corporation (hereinafter Wheeling-Pitt). Under this Order, Wheeling-Pitt agrees to undertake all actions required by the terms and conditions of this Order and consents to and will not contest the Chief's jurisdiction regarding this Order. However, Wheeling-Pitt does not admit to any factual and legal determinations made by the Chief in this Order and reserves all rights and defenses available regarding liability or responsibility in any proceedings regarding Wheeling-Pitt other than proceedings, either administrative or civil, to enforce this Order.

Basis for Order

In support of this Order, the Chief hereby finds the following:

1. A Compliance Evaluation Inspection (CEI) of this facility on October 21, 1987 (supplemental memo) revealed that Wheeling-Pitt was storing hazardous wastes without a permit or interim status, in violation of Section 11.1 of the West Virginia Hazardous Waste Management Regulations and Chapter 20, Article 5E, Section 8 of the Code of West Virginia and, that satellite accumulation containers were neither kept closed nor labelled with the words "Hazardous Waste" (or other appropriate markings) in violation of Section 6.3.5.c. of the West Virginia Hazardous Waste Management Regulations (hereinafter "the Regs").

2. A CEI inspection of this facility on October 19, 1988 disclosed that Wheeling-Pitt has been storing containers of hazardous waste on-site without a permit or interim status, in violation of Section 11.1 of the Regs and Chapter 20, Article 5E, Section 8 of the Code of West Virginia. This is a repeat violation.

3. This same inspection also revealed that containers of hazardous waste accumulated in the satellite accumulation area were not moved to the drum storage area and marked and labelled in accordance with Section 6.3.5.a. of the Regs within three (3) days of their being filled, in violation of Section 6.3.5.c. of the Regs. This is a repeat violation of Satellite Area Accumulation Regulations.

4. Additionally, during this same inspection, it was revealed that some containers of hazardous waste being accumulated on-site were not marked with the words "Hazardous Waste", in violation of Section 6.3.5.a.4. of the Regs and some containers of hazardous waste being accumulated on-site were not marked with the date upon which accumulation began, in violation of Section 6.3.5.a.2. of the Regs.

5. Also, this inspection revealed that the facility's Contingency Plan did not contain the phone number or addresses of the facility's emergency coordinators, in violation of 40 CFR §265.52(d) as referenced by Section 6.3.5.a.5. of the Regs.

6. A case-development inspection of Wheeling-Pitt on December 22, 1988 disclosed that the containers of hazardous waste which were previously being stored in violation of Section 11.1 of the Regs were <u>still</u> on-site and that the previously unmarked and un-dated drums were now marked but dated with dates which were <u>not</u> the dates upon which accumulation began.

Requirements of Order

Now, therefore, in accordance with Chapter 20, Article 5E, Section 14 of the Code of West Virginia, it is hereby agreed between the parties and **ORDERED** by the Chief as follows:

1. Within 30 days of the date of this Order, Wheeling-Pitt must remediate all of the violations listed in Basis for Order. To wit: all containers of hazardous waste being stored in violation of Section 11.1 of the Regs must be shipped off-site in compliance with all applicable regulations, all containers of hazardous waste being accumulated on-site must have the words "Hazardous Waste" marked on them as well as the date upon which accumulation began, all containers of hazardous waste in the satellite accumulation area must be managed in accordance with Section 6.3.5.c. of the Regs, and finally, that the facility's contingency plan must be complete and up-to-date in full compliance with 40 CFR §265.52(d).

2. Wheeling-Pitt must document these remedial actions to the Chief, in writing, within the 30 day time-frame.

3. For violations specified in Basis for Order, Wheeling-Pitt will pay an Administrative Settlement of $25,500 to the West Virginia Hazardous Waste Management Fund.

4. For each day that Wheeling-Pitt fails to meet any deadline or performance requirement specified in this Order, Wheeling-Pitt agrees to pay into the West Virginia Hazardous Waste Management Fund $250.00 for each day the action remains incomplete. If any action is not completed after 30 days of its required due date, Wheeling-Pitt agrees to pay into the West Virginia Hazardous Waste Management Fund $1000.00 for each day, exceeding the initial 30 days, until such time as the action is complete.

5. The Chief expressly reserves all rights and defenses which he may have pursuant to any legal authority as well as a right to raise, as a basis for supporting such legal authority or defenses, facts other than those enumerated in Basis for Order.

6. Wheeling-Pitt hereby waives its right to appeal this Order under the provisions of Chapter 20, Article 5E, Section 19 of the Code of West Virginia.

MAR 15 1989

Date of Issuance

B. Douglas Steele

B. Douglas Steele, Ph. D., Chief
Division of Waste Management

Wheeling-Pittsburgh Steel Corporation
Vice President, Secretary and
General Counsel